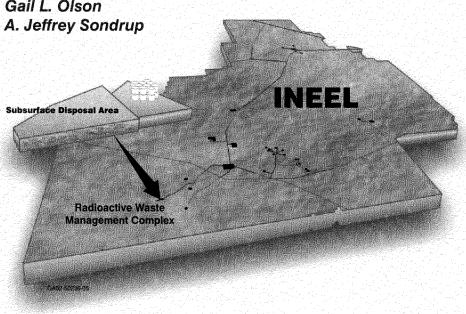
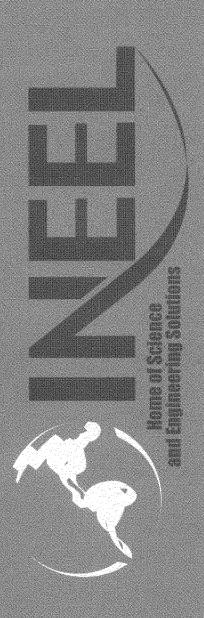
# Ancillary Basis for Risk Analysis of the Subsurface Disposal Area

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September 2002

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Prepared for the
U.S. Department of Energy
Assistant Secretary for Environmental Management
Under DOE Idaho Operations Office
Contract DE-AC07-99ID13727

# Ancillary Basis for Risk Analysis of the Subsurface Disposal Area

#### INEEUEXT-02-01125

## September 2002

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### **ABSTRACT**

The Subsurface Disposal Area is a radioactive waste landfill located at the Radioactive Waste Management Complex at the Idaho National Engineering and Environmental Laboratory in southeastern Idaho. Contaminants in the landfill include hazardous chemicals, remote-handled fission and activation products, and transuranic radionuclides. The Ancillary Basis for fisk Analysis was prepared to support the hture comprehensive remedial investigatiodfeasibility study within the framework of the Comprehensive Environmental Response, Compensation, and Liability Act as implemented in the Federal Facility Agreement and Consent Order between the U.S. Department of Energy, the Idaho Department of Environmental Quality, and the U.S. Environmental Protection Agency.

Estimated cumulative human health and ecological risks associated with the Subsurface Disposal Area are presented in this Ancillary Basis for fisk Analysis. Based on risk analysis described in this document, 12 radionuclides and four chemical contaminants are identified as human health contaminants of concern: Am-241, C-14, I-129, Nb-94, Np-237, Sr-90, Tc-99, U-233, U-234, U-235, U-236, U-238, carbon tetrachloride, methylene chloride, nitrates, and tetrachloroethylene. In addition, Pu-238, Pu-239, and Pu-240 were classified as special case contaminants of concern to acknowledge uncertainties about plutonium mobility in the environment and to reassure stakeholders that risk management decisions for the SDA will be h11y protective of the Snake fiver Plain Aquifer. Ecological risk assessment identified four radionuclides and three chemical contaminants of concern: Am-241, Pu-239, Pu-240, Sr-90, cadmium, lead, and nitrates.

The conclusion of this report is that the Subsurface Disposal Area poses unacceptable long-term risk to human health and the environment.

#### **EXECUTIVE SUMMARY**

The Subsurface Disposal Area is a radioactive waste landfill located at the Idaho National Engineering and Environmental Laboratory (INEEL) Radioactive Waste Management Complex (RWMC) in southeastern Idaho. Contaminants in the landfill include hazardous chemicals, remote-handled fission and activation products, and transuranic radionuclides. The Ancillary Basis for fisk Analysis was prepared to support the hture comprehensive remedial investigatiodfeasibility study (RI/FS) for the RWMC, which will be developed within the framework of the Comprehensive Environmental Response, Compensation, and Liability Act as implemented in the Federal Facility Agreement and Consent Order between the U.S. Department of Energy, the Idaho Department of Environmental Quality, and the U.S. Environmental Protection Agency.

Estimates of cumulative human health and ecological risks associated with the Subsurface Disposal Area are presented in this Ancillary Basis for fisk Analysis. Twelve radionuclides and four chemical contaminants are identified as human health contaminants of concern: Am-241, C-14, I-129, Nb-94, Np-237, Sr-90, Tc-99, U-233, U-234, U-235, U-236, U-238, carbon tetrachloride, methylene chloride, nitrates, and tetrachloroethylene. In addition, Pu-238, Pu-239, and Pu-240 are classified as special case contaminants of concern to acknowledge uncertainties about plutonium mobility in the environment and to reassure stakeholders that risk management decisions for the Subsurface Disposal Area will be h11y protective. In the ecological risk assessment described in this document, four radionuclides and three chemicals were identified as ecological contaminants of concern: Am-241, Pu-239, Pu-240, Sr-90, cadmium, lead, and nitrates.

Site evaluation typically is an iterative process, with each iteration providing an increasingly refined assessment. This study is a continuation and update of the 1998 Interim Risk Assessment and Contaminant Screening for the WasteArea Group 7 Remedial Investigation. Much of the information in this document was taken from the Interim fisk Assessment and updated to reflect additional information developed over the past few years. The setting for analysis, nature and extent of environmental contamination associated with the site, modeling to estimate media concentrations over time, and baseline risk assessment are summarized below.

## **Historical and Physical Setting**

The INEEL is located in southeastern Idaho and occupies 2,305 km² (890 mi²) in the northeastern region of the Snake fiver Plain. Regionally, the INEEL is nearest to the cities of Idaho Falls and Pocatello and to U.S. Interstate Highways 1-15 and I-86. The INEEL Site extends nearly 63 km (39 mi) from north to south, is about 58 km (36 mi) wide in its broadest southern portion, and occupies parts of five southeast Idaho counties. Public highways (i.e., U.S. 20 and 26 and Idaho 22, 28, and 33) within the INEEL boundary and the Experimental Breeder Reactor I, which is a national historic landmark, are accessible without restriction. Otherwise, access to the INEEL is controlled.

Neighboring lands are used primarily for farming or grazing, or are in the public domain (e.g., national forests and state-owned land). Various programs at the INEEL are conducted under supervision of three U.S. Department of Energy offices: the U.S. Department of Energy Idaho Operations Office, the Pittsburgh Naval Reactors Office, and the Chicago Operations Office. With overall responsibility for the INEEL Laboratory, the U.S. Department of Energy Idaho Operations Office selects and authorizes government contractors to operate at the Site. The Site provides a variety of programmatic and support services related to nuclear reactor design and development, nonnuclear energy development, materials testing and evaluation, operational safety, radioactive waste management, and environmental restoration. Spent nuclear fuel management, hazardous and mixed waste management and minimization, cultural resources preservation, environmental engineering, protection, and remediation, and long-term stewardship are challenges addressed by current INEEL activities. The laboratory's hture mission, delivering science-based solutions to current challenges of DOE, other federal agencies, and industrial clients, encompasses four areas: environmental quality, energy resources, national security, and science.

The Radioactive Waste Management Complex, located in the southwestern quadrant of the INEEL, encompasses a total of 72 ha (177 acres) and is divided into three separate areas by function: the Subsurface Disposal Area, the Transuranic Storage Area, and the administration and operations area. The original landfill, established in 1952, covered 5.2 ha (13 acres) and was used for shallow land disposal of solid radioactive waste. In 1958, the landfill was expanded to 35.6 ha (88 acres). Relocating the security fence in 1988 to outside the dike surroundingthe landfill established the current size of the Subsurface Disposal Area as 39 ha (97 acres). The Transuranic Storage Area was added to the Radioactive Waste Management Complex in 1970. Located adjacent to the east side of the Subsurface Disposal Area, the Transuranic Storage Area encompasses 23 ha (58 acres) and is used to store, prepare, and ship retrievable transuranic waste to the Waste Isolation Pilot Plant. The 9-ha (22-acre) administration and operations area at the Radioactive Waste Management Complex includes administrative offices, maintenance buildings, equipment storage, and miscellaneous support facilities.

Waste acceptance criteria and record-keeping protocols for the Subsurface Disposal Area have changed over time in keeping with waste management technology and legal requirements. Today's requirements are much more stringent as a consequence of knowledge developed over the past several decades about potential environmental impacts of waste management techniques. In the past, however, shallow landfill disposal of radioactive and hazardous waste was the technology of choice. At the Subsurface Disposal Area, transuranic and mixed waste, mostly from the Rocky Flats Plant in Colorado, were disposed of through 1970. Mixed waste containing hazardous chemical and radioactive contaminants was accepted through 1984. Since 1985 waste disposals in the Subsurface Disposal Area have been limited to low-level radioactive waste from INEEL waste generators. Waste is buried in pits, trenches, and soil vaults, as illustrated in Figure E-1.

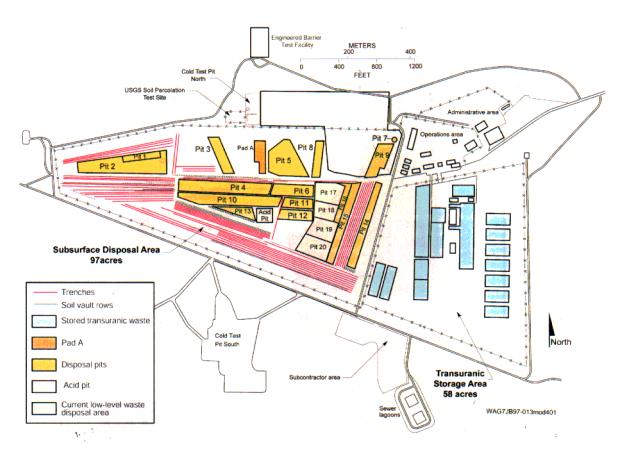


Figure E-1. Layout of the Radioactive Waste Management Complex and pits, trenches, and soil vaults in the Subsurface Disposal Area.

The INEEL region is classified as arid to semiarid because of the low average rainfall of 22.1 cm/year (8.7 in./year). The Radioactive Waste Management Complex is located within a natural topographic depression with no permanent surface water features. However, the local depression tends to hold precipitation and to collect additional runoff from surrounding slopes. Surface water either eventually evaporates or infiltrates into the vadose zone (i.e., unsaturated subsurface) and the underlying aquifer.

The crescent-shaped Snake River Plain Aquifer underlies the eastern portion of the Snake River Plain. The aquifer is bounded on the north and south by the edge of the Snake River Plain, on the west by surface discharge into the Snake River near Twin Falls, Idaho, and on the northeast by the Yellowstone basin. Consisting of a series of water-saturated basalt layers and sediment, the aquifer underlies the Radioactive Waste Management Complex at an approximate depth of 177 m (580 ft), and flows generally from the northeast to the southwest, Figure E-2 illustrates the location of the INEEL relative to the aquifer.

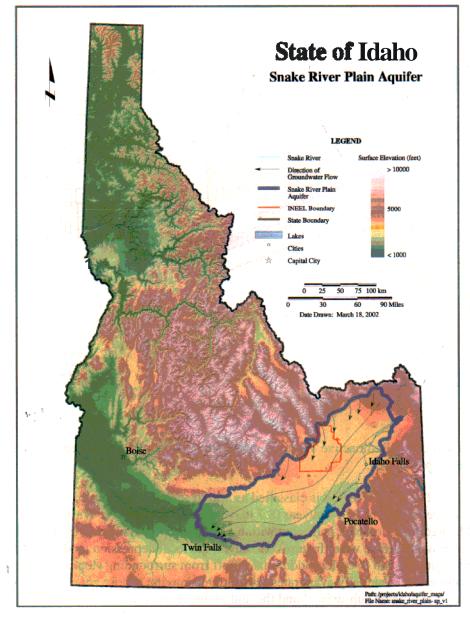


Figure E-2. Location of the Idaho National Engineering and Environmental Laboratory relative to the Snake River Plain Aquifer.

The regional subsurface consists mostly of layered basalt flows with a few comparatively thin layers of sedimentary deposits. Layers of sediment, referred to as interbeds, tend to retard infiltration to the aquifer and are important features in assessing the fate and transport of contaminants. In the 177-m (580-ft) interval from the surface to the aquifer, three major interbeds are of particular importance. Using nomenclature established by the U.S. Geological Survey, these sedimentary layers are referred to as the A-B, B-C, and C-D interbeds.

### **Nature and Extent of Contamination**

The nature and extent of contamination associated with the Subsurface Disposal Area in all environmental media were evaluated in the Operable Unit 7-13/14 remedial investigation. The human health contaminant screening in the Interim fisk Assessment and the ecological contaminant screening in the *Review of WasteArea Group 7Ecological Contaminants of Potential Concern* document were used to define contaminants for analysis. The final human health list of contaminants of potential concern contained 20 radionuclides and four chemical contaminants. Many of these contaminants are ecological contaminants of potential concern.

In addition to routine monitoring at the Radioactive Waste Management Complex, several unique approaches were adopted to characterize the nature and extent of contamination. To describe the waste zone, a database containing contaminant inventories and waste descriptions was developed. A second database was created to map characterization data and disposal locations in the Subsurface Disposal Area. Called WasteOScope, the mapping software is based on historical disposal records including shipping manifests and trailer load lists. In addition, electromagnetic and soil gas surveys were evaluated against waste zone maps. More than 300 probes were installed to characterize buried waste using instruments developed at the INEEL. Data from surveys and probes were incorporated into WasteOScope to allow visually superimposing various data sets. A new type of tensiometer, referred to as the advanced tensiometer, also was developed at the INEEL to allow deeper tensiometer monitoring in the vadose zone.

The evaluation of nature and extent considered depth intervals as follows: the waste zone, the interval excluding the waste zone and extending from the surface to 11 m (35 ft), from 11 to 43 m (35 to 140 ft), from 43 to 77 m (140 ft to 250 ft), and depths greater than 77 m (250 ft). These intervals were defined to reflect the regions bounded by the A-B, B-C, and C-D interbeds.

Contaminants of potential concern have been detected at low concentrations in the vadose zone and may be migrating toward the aquifer. Most vadose zone detections are in the 0 to 11-m (0 to 35-ft) and 11 to 43-m (35 to 140-ft) intervals above the B-C interbed, with some contaminants detected in deeper intervals. The most frequently detected contaminants in the environment include nitrates, carbon tetrachloride, C-14, Tc-99, and uranium isotopes. Other contaminants including Am-241,I-129, Pu-238, and Pu-239/240 have been detected sporadically at concentrations near the detection limits. Carbon tetrachloride has been detected down to the aquifer, though concentrations decrease significantly below the B-C interbed and again below the C-D interbed. Because carbon tetrachloride migrates in the gaseous phase, it also has been detected hundreds of meters laterally away from buried waste.

A conclusion of the evaluation of the nature and extent of contamination is that low concentrations of carbon tetrachloride, nitrates, and C-14 have been detected in the Snake fiver Plain Aquifer near the Subsurface Disposal Area. Carbon tetrachloride has been measured slightly above the maximum contaminant level. Low concentrations of nitrate and C-14, well below maximum

contaminant levels, also have been detected in the region and may be increasing. The Subsurface Disposal Area is the obvious source of the carbon tetrachloride, but the source of the nitrate and C-14 is not as clear.

The monitoring network at the Radioactive Waste Management Complex has been greatly expanded since 1998 with 22 additional vadose zone lysimeters, four upgradient aquifer wells, an aquifer well inside the Subsurface Disposal Area, and more than 300 probes in the buried waste. Most of these new installations have not been operational long enough to provide substantial quantities of data. The expanded network will continue to produce data for continued evaluation of source release into the vadose zone, contaminant migration through the vadose zone, and potential impacts to the aquifer beneath the Subsurface Disposal Area. Monitoring data will also support hture remediation by providing a baseline for remediation goals.

## **Contaminant Fate and Transport**

Modeling was conducted to simulate release and migration of contaminants from waste buried in the Subsurface Disposal Area and to estimate hture contaminant concentrations in environmental media. Models implemented were essentially the same as those used in the Interim fisk Assessment with some improvements to incorporate additional data. Several sensitivity cases were modeled to evaluate effects of variations in several parameters of interest on estimated media concentrations and risk.

Complete exposure pathways defined by the conceptual site model formed the basis for three types of simulations: source release, subsurface transport, and biotic transport. The persistence of contaminants in the environment was evaluated based on contaminant mobility controlled by dissolved-phase transport and biotic transfer by animals and plants intruding into the waste. For radioactive contaminants of potential concern, half-lives also were considered. Chemical degradation was not assessed.

The DUST-MS source term model was used to simulate release of contaminants from waste and into the subsurface. Based on waste inventory estimates and waste characteristics, the model simulated the release of contaminant mass from buried waste for three types of release mechanisms: surface washoff, diffusion, and dissolution. Once mass was released, it was available for biotic transport to the surface or for migration in the subsurface. Sample data for the shallow subsurface from areas around the Subsurface Disposal Area were not representative of concentrations beneath the waste and, therefore, were not useful for calibrating the source term model. Indirect, limited calibration was achieved by comparing measured to simulated aquifer concentrations.

Subsurface fate and transport modeling focused on dissolved-phase transport using the TETRAD simulator. Vapor-phase transport was not specifically modeled for this investigation for contaminants such as C-14. For volatile organic compounds, concentrations were estimated by scaling the results in the Interim fisk Assessment on the basis of revised inventory estimates. Using information from the source release model, the TETRAD model simulated

migration of dissolved-phase contaminants in the vadose zone and aquifer. The model emulated fate and transport beginning in 1952 and extending until concentrations peaked in the aquifer up to 10,000 years in the hture. The model domain was based on interpolations of known characteristics of the subsurface, such as depths and thicknesses of interbeds and water velocity in the aquifer. Other model parameters to describe contaminant migration, such as partition coefficients, were defined using site-specific information. Reasonable values from the literature were selected when site-specific information was not available. Estimated media concentrations were compared to monitoring data. However, model calibration beyond the limited calibration achieved previously in the Interim fisk Assessment was not attempted because of the lack of calibration targets provided by monitoring data. In other words, contaminants of particular interest for model calibration, such as C-14, uranium, and other actinides, have been detected sporadically and at very low concentrations that do not describe migration trends. Low concentrations, coupled with lack of trends, cannot be emulated with any confidence.

The DOSTOMAN code was used to simulate transport of contaminants to the surface by plants and animals and to estimate resulting surface soil concentrations. Rate constants and other input parameters used in the code were selected from current literature, with preference given to values specific to the Subsurface Disposal Area and the INEEL. Though limited comparisons of estimated-to-measured surface soil concentrations were produced, calibration for the biotic model was not pursued. Maintenance, contouring, and subsidence repairs at the landfill disturb the surface of the site, and the sparse data that are available are not representative of biotic uptake. In addition, the analysis adopts the fundamental assumption that hture action at the Subsurface Disposal Area under any remediation scenario will include a cap that would inhibit human intrusion and biotic uptake.

### **Baseline Risk Assessment**

The Subsurface Disposal Area was considered in a comprehensive manner by evaluating the cumulative, simultaneous risk for all complete exposure pathways for all contaminants of potential concern. The assessment evaluated the impacts of exposure to the concentrations of contaminants in soil and groundwater estimated by the models described above. Methodology applied to estimate current and hture impacts to human health and the environment are described below.

#### **Human Health Baseline Risk Assessment**

Potential risks to human receptors posed by the 24 contaminants of potential concern defined in the Interim fisk Assessment were quantitatively evaluated in the human health component of the baseline risk assessment. Analysis included exposure and toxicity assessments, risk characterization, and limited evaluation of sensitivity and uncertainty. For radionuclides, long-lived decay chain products were considered to assess cumulative effects. Risks from volatile organic compounds were scaled from the Interim fisk Assessment results based on the inventory updates.

fisk estimates were developed for current and hture occupational receptors and for current and hypothetical hture residential receptors. For the current residential scenario, groundwater ingestion risk at the INEEL boundary was assessed. Surface exposure pathways were not examined for a current residential exposure because residential development near the Radioactive Waste Management Complex is prohibited by site access restrictions. Future residential exposures were simulated to begin in 2110 to reflect a postulated remediation in 2010 followed by an assumed 100-year institutional control period. The hture residential analysis reflects assumptions that a cap and institutional controls would preclude access into the waste, but that a location immediately adjacent to the Radioactive Waste Management Complex could be inhabited. Concentrations and risks were simulated out to 1,000 years for all pathways except groundwater ingestion. Groundwater risks were simulated until peak concentrations occurred up to a maximum of 10,000 years.

fisk estimates for hypothetical hture residential exposure bounded risks for all scenarios by exceeding those for both occupational scenarios and for the current residential scenario. The location of the maximum cumulative risk is near the southeast corner of the Subsurface Disposal Area and the primary exposure pathway is groundwater ingestion.

#### **Ecological Risk Assessment**

The scope of the ecological risk assessment was limited because of the fundamental assumption that the Subsurface Disposal Area will be covered with a cap under any remediation scenario. Current-year and 100-year scenarios were evaluated for representative receptors. Contaminant screening was performed in the *Review of WasteArea Group 7 Ecological Contaminants of Potential Concern* document to limit the evaluation to those contaminants with a maximum likelihood to pose unacceptable risk. Concentrations in surface soil and subsurface intervals were estimated with the DOSTOMAN biotic uptake model.

### **Conclusions**

Contaminants of concern for Operable Unit 7-13/14 for human and ecological exposures are given in Tables E-1 and E-2. Contaminants of concern were identified initially based on human health and ecological risk estimates. Risk-based criteria for human health of 1E-05 risk and a cumulative hazard index in excess of 2 were applied. Sixteen human health contaminants of concern were identified. In addition, three plutonium isotopes were classified as special case contaminants of concern to acknowledge uncertainties about plutonium mobility in the environment and to reassure stakeholders that risk management decisions for the SDA will be h11y protective. Seven ecological contaminants of concern were identified based on a hazard quotient in excess of 1 for radionuclides and a hazard quotient of 10 or greater for nonradionuclides.

Table E-1. Human health contaminants of concern.

The transfer that		Peak		Peak Hazard		Primary 1,000-Year
Contaminant	Note	Risk	Year	Index	Year	Exposure Pathway
Ac-227		3E-06	3010 <sup>a</sup>	NAb	NA	Groundwater ingestion
Am-241	1,3	3E-05	2953	NA	NA	Soil ingestion, inhalation, external exposure, and crop ingestion
Am-243	JAK	4E-08	3010 <sup>a</sup>	NA	NA	External exposure
C-14	1,4	6E-04	2278	NA	NA	Groundwater ingestion
Cl-36		6E-06	2110	NA	NA	Groundwater ingestion
Cs-137		5E-06	2110	NA	NA	External exposure
I-129	1,3	6E-05	2110	NA	NA	Groundwater ingestion
Nb-94	1,3	8E-05	3010 <sup>a</sup>	NA	NA	External exposure (groundwater ingestion)
Np-237	1,4	4E-04	3010 <sup>a</sup>	NA	NA	Groundwater ingestion
Pa-231	ar lek	3E-06	3010 <sup>a</sup>	NA	NA	Groundwater ingestion
Pb-210		5E-07	3010 <sup>a</sup>	NA	NA	Soil and crop ingestion
Pu-238	2	1E-09	2286	NA	NA	Soil and crop ingestion
Pu-239	2	2E-06	3010 <sup>a</sup>	NA	NA	Soil and crop ingestion
Pu-240	2	2E-06	3010 <sup>a</sup>	NA	NA	Soil and crop ingestion
Ra-226 botton	nizo g	3E-06	3010 <sup>a</sup>	NA	NA	External exposure
Sr-90	1,4	1E-04	2110	NA	NA	Crop ingestion
Tc-99	1,4	4E-04	2110	NA	NA	Groundwater ingestion and crop ingestion
Th-229		4E-07	3010 <sup>a</sup>	NA	NA	Groundwater ingestion
Th-230		7E-07	3010 <sup>a</sup>	NA	NA	Groundwater ingestion
Th-232		1E-09	3010 <sup>a</sup>	NA	NA	Crop ingestion
U-233	1,3	3E-05	3010 <sup>a</sup>	NA	NA	Groundwater ingestion
U-234	1,4	2E-03	3010 <sup>a</sup>	NA	NA	Groundwater ingestion
U-235	1,4	1E-04	2662	NA	NA	Groundwater ingestion
U-236	1,4	1E-04	3010 <sup>a</sup>	NA	NA	Groundwater ingestion
U-238	1,4	3E-03	3010 <sup>a</sup>	NA	NA	Groundwater ingestion
Carbon tetrachloride	1,5	2E-03 <sup>c</sup>	2105	5E+01°	2105	Inhalation and groundwater ingestion
Methylene chloride	1,3	2E-05°	2185	1E-01 <sup>c</sup>	2185	Groundwater ingestion
Nitrates   Salara de	1,6	NA	NA	1E+00	2120	Groundwater ingestion
Tetrachloroethylene	1,6	NA	1952	1E+00°	2137	Groundwater ingestion and dermal exposure to contaminated water

Notes: For toxicological risk, the peak hazard index is given, and for carcinogenic probability, the peak risk is given.

<sup>1.</sup> Green = the contaminant is identified as a human health contaminant of concern based on carcinogenic risk greater than 1E-05 or a hazard index greater than or equal to 1 contributing to a cumulative hazard index greater than 2.

<sup>2.</sup> Brown = plutonium isotopes are classified as special case contaminants of concern to acknowledge uncertainties about plutonium mobility in the environment and to reassure stakeholders that risk management decisions for the SDA will be fully protective

<sup>3.</sup> Blue = carcinogenic risk between 1E-05 and 1E-04

<sup>4.</sup> Red = carcinogenic risk greater than 1E-04

<sup>5.</sup> Pink = toxicological (noncarcinogenic) hazard index greater than or equal to 1.

a. The peak groundwater concentration does not occur before the end of the 1,000-year simulation period. Groundwater ingestion risks and hazard indices were simulated for the peak concentration occurring within 10,000 years and are not presented in this table. b. NA = not applicable.

c. The risk estimates were produced by scaling results from the Interim Risk Assessment (IRA) (Becker et al. 1998) based on inventory updates.

Table E-2. Ecological contaminants of concern and risk summary for subsurface soil contamination.

_	Hazard	Quotient"		Hazard Q	uotient <sup>a,b</sup>
Nonradionuclide	Current	100-year	Radionuclide	Current	100-year
Contaminant	Scenario	Scenario	Contaminant	Scenario	Scenario
Cadmium	<1 to <9	<1 to 20	Am-241	<0.1 to 21	0.7 to 41
Lead	<1 to <6	<1 to 20	Pu-239	NA	<0.1  to > 1
Nitrates	<1 to>10	< 0.1	Pu-240	NA	<0.1  to > 1
			Sr-90	<0.1 to >25	NA

Volatile organic compounds (i.e., carbon tetrachloride, methylene chloride, and tetrachloroethylene) and nitrates pose the most imminent risk. Nearly all of the volatile organic compounds and nitrates in the Subsurface Disposal Area originated at Rocky Flats Plant. Carbon tetrachloride has been detected in the aquifer slightly above the maximum contaminant level and is being extracted from the vadose zone to reduce risk. However, volatile organic compound release from waste buried in the Subsurface Disposal Area is ongoing, and, if not sufficiently mitigated by the vadose zone vapor vacuum extraction, poses the most imminent risk.

Mobile long-lived fission and activation products are the next most immediate concern. The majority of the mobile fission and activation products was generated by INEEL reactor operations. The degree of urgency associated with risk estimates for fission and activation products has not been validated because of uncertainties associated with C-14,I-129, and Tc-99 model parameters. Though these contaminants have been detected sporadically in the environment and some trends may be developing, they do not occur at levels predicted by the modeling. Monitoring locations immediately proximal to the waste using waste zone probes is extremely important to assess the rate at which potential contamination in the vadose zone is developing. Interpreting monitoring data can be used to validate the appropriateness of expedited remediation of buried waste to mitigate risk.

Uranium and Np-237 contribute the majority of the risk several hundred years in the hture. Roughly half of the uranium inventories were generated at the INEEL while the other half was generated off-Site, primarily at Rocky Flats Plant. Evaluating the nature and extent of uranium in the environment is confounded by naturally occurring concentrations of various isotopes in environmental media. Uranium attributable to human activities has been detected in the vadose zone beneath the Subsurface Disposal Area, indicating that some migration may be occurring. However, all local aquifer concentrations are consistent with natural uranium background values. Most of the original disposals of Np-237 originated at the INEEL, nearly all of the Am-241, the

parent of Np-237, was generated at Rocky Flats Plant. Though Am-241 has been detected sporadically in the environment, Np-237 has not been detected.

Risks in excess of threshold values are associated with waste buried in the Subsurface Disposal Area, and identifying contaminants of concern and their associated waste streams in this Ancillary Basis for Risk Analysis is an appropriate basis for project planning for Waste Area Group 7. Tasks defined for Waste Area Group 7 should focus on developing information that could substantially influence remedial decision making. Examples include validating or refuting expedited remediation of fission and activation products.

A second revision to the Scope of Work and second Addendum to the Work Plan are being developed for Operable Unit 7-13/14 by the U.S. Department of Energy in cooperation with the Idaho Department of Environmental Quality and the U.S. Environmental Protection Agency. Scope required to complete the comprehensive remedial investigatiodfeasibility study will be outlined in the revised Scope of Work and described in detail in the Work Plan addendum. Efforts will focus on monitoring, waste zone mapping, and developing the feasibility study to assess remedial alternatives to mitigate risk associated with waste buried in the Subsurface Disposal Area.

## **ACKNOWLEDGMENTS**

This report embodies the cooperative effort of numerous technical and support staff, without whose many contributions and commitment to excellence this work would not have been possible. The authors would like to recognize and express their gratitude to the contributors listed below, with hopes that accidental omissions will be forgiven. In addition, the authors also would like to thank the many reviewers of Waste Area Group 7 products whose comments and insights helped to develop this study.

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## **CONTENTS**

ABS	ΓRAC	Γ		iii				
EXE	CUTIV	E SUMMAI	RY	v				
ACK	NOWI	LEDGMENT	TS	xvii				
CON	TENT	S		xix				
ACR	ONYN	4S		. liii				
1.	INTR	RODUCTION	V	1-1				
	1.1	Purpose		1-1				
	1.2	-	Schedule and Scope					
	1.3	Regulatory Background						
	1.4	Report Org	anization	1-3				
	1.5	References		1-6				
2.	SITE	BACKGRO	OUND	2-1				
	2.1	Location ar	nd Description	2-1				
	2.2	Physical Cl	naracteristics	2-2				
		2.2.1 2.2.2 2.2.3 2.2.4 2.2.5 2.2.6 2.2.7 2.2.8	Physiography	2-4 2-8				
	2.3	Geologic an Complex	nd Hydrologic Investigations at the Radioactive Waste Management	2-26				
		2.3.1 2.3.1 2.3.2 2.3.3 2.3.4	Neutron-Probe Access Tube Moisture Monitoring  Advanced Tensiometer Investigation  Lysimeter Investigations.  Tracer Studies  Effects of Upgradient Aquifer Plumes on the Radioactive Waste Management Complex	2-26 2-29 2-33 2-38				
	2.4	Flora and F	Fauna	2-47				

	2.5	Demograp	phy	2-48
		2.5.1	On-Site Populations.	2-48
		2.5.2	Off-Site Populations	
		2.5.3	Shoshone-Bannock Tribal Interests	2-50
	2.6	Land Use		2-50
		2.6.1	Current Land Use	2-50
		2.6.2	Radioactive Waste Management Complex Current and Future Land Use	2-53
	2.7	Cultural R	Resources	2-54
		2.7.1	Cultural Resources Overview	2-54
		2.7.2	Radioactive Waste Management Complex Cultural Resources	2-55
	2.8	Reference	S	2-56
3	WAS	STE AREA	GROUP 7 DESCRIPTION AND BACKGROUND	3-1
	3.1	Operation	al Background	3-4
		3.1.1	Collocated Facilities Analysis for Waste Area Group 7	3-4
		3.1.2	Historical Operations from 1952 to 1985	3-5
		3.1.3	Radioactive Waste Management Complex Operations from 1985 to the Present	
		3.1.4	Subsurface Disposal Area Buried Waste Retrievals	
		3.1.5	Summary of Disposals in the Subsurface Disposal Area	
		3.1.6	Soil Cover and Surface Drainage Maintenance	
	3.2	Summary	of Waste Area Group 7 Operable Units	3-33
		3.2.1	Operable Unit 7-01, Subsurface Disposal Area Soil Vaults, Track 2	
			Investigation	
		3.2.2	Operable Unit 7-02, Acid Pit, Track 2 Investigation	3-38
		3.2.3	Operable Unit 7-03, Nontransuranic-Contaminated Waste Pits and	2.46
			Trenches, Track 1 Investigation	
		3.2.4	Operable Unit 7-04, Air Pathway, Track 2 Investigation	3-40
		3.2.5	Operable Unit 7-05, Surface Water Pathways and Surficial Sediments, Track 2 Investigation	3-41
		3.2.6	Operable Unit 7-06, Groundwater Pathway, Track 2 Investigation	3-41 3-42
		3.2.7	Operable Unit 7-00, Vidouse Zone Radionuclides and Metals, Track 2	3-42
		3.2.7	Investigation	3-43
		3.2.8	Operable Unit 7-08, Organic Contamination in the Vadose Zone	
		3.2.9	Remedial InvestigatiodFeasibility Study	3 <del>-4</del> -
			Investigation	3-47
		3.2.10	Operable Unit 7-10, Pit 9 Process Demonstration Interim Action	
		3.2.11	Operable Unit 7-11, Septic Tanks and Drain Fields, Track 1	
			Investigation	3-51
		3.2.12	Operable Unit 7-12, Pad A. Remedial InvestigatiodFeasibility Study	3-52

	3.2.13	Operable Unit 7-13. Transuranic Pits and Trenches Remedial	
		InvestigatiodFeasibility Study	3-53
	3.2.14	Operable Unit 7-13/14 Comprehensive Remedial	
		InvestigatiodFeasibility Study	
	3.2.15	Active Low-Level Waste Disposal Operations	3-53
3.3	Source Terr	m Assessment	3-53
	3.3.1	Historical Data Task	3-54
	3.3.2	Recent and Projected Data Task	3-54
	3.3.3	WasteOScope	3-55
3.4	Contaminar	nt Screening for the Baseline fisk Assessment	3-55
	3.4.1	Human Health Contaminant Screening for the Baseline fisk Assessment	3-56
	3.4.2	Ecological Contaminant Screening for the Baseline fisk Assessment	
3.5	Geophysica	ıl Investigations	3-63
3.6	Summary o	f Soil Sampling from 1959 to 1970	3-69
3.7	Probing in t	he Subsurface Disposal Area	<b>3-7</b> 1
	3.7.1	Probing Background	3-71
	3.7.2	Type A Probes and Logging Instruments	
	3.7.3	Type B Probes and Instrumentation	
	3.7.4	Pit 9 Study Area	
	3.7.5	Depleted Uranium Focus Area	
	3.7.6	Organic Sludge Focus Area	
	3.7.7	Americium and Neptunium Focus Area	
	3.7.8	Uranium and Enriched Uranium Focus Area in Pit 5	
	3.7.9	Activated Metal Investigations	
	3.7.10	Waste Zone Moisture Monitoring Array	
	3.7.10	Type A Logging Results Used to Estimate Cover and Waste Zone	
		Thickness	3-99
	3.7.12	Continued Data Collection in the Subsurface Disposal Area Probes	3-101
3.8	Actinide Re	etardation Studies	3 _102
3.9	Carbon-14	Characterization	3 _109
	3.9.1	Estimated Activity in Beryllium Blocks Buried in the Subsurface	
		Disposal Area	3-109
	3.9.2	Beryllium Reflector Block Monitoring	3-114
	3.9.3	Activated Metal Monitoring	3-117
3.10	Preliminary	Criticality Analysis for the Radioactive Waste Management Complex	3-122
3.11	References		3-123

4.	NAT	URE AND	EXTENT OF CONTAMINATION	4-1
	4.1	Waste Zo	ne Data	4-1
		4.1.1	Inventory Data and Disposal Information	4-1
		4.1.2	Ingrowth	4-10
		4.1.3	Nuclear Logging of the Waste Zone	4-14
	4.2	Surface S	ample Data	4-16
	4.3	Vadose Z	one Data	4-16
		4.3.1	Suction Lysimeter Network	4-16
		4.3.2	Perched Water Sampling with a Bailer	4-22
		4.3.3	Core Sampling	4-22
	4.4	Aquifer D	Data	4-22
	4.5	Data Inte	rpretation Considerations	4-24
		4.5.1	Quality Assurance	4-24
		4.5.2	Radiological Uncertainty	
		4.5.3	Nitrogen Species	4-28
		4.5.4	Nuclear Logging Data	4-29
		4.5.5	Early 1970s Data	4-29
		4.5.6	Lysimeter Data	4-31
		4.5.7	Aquifer Data	
	4.6	Radiologi	ical Results	4-32
		4.6.1	Actinium-227	4-33
		4.6.2	Americium-241	4-34
		4.6.3	Americium-243	4-47
		4.6.4	Carbon-14	4-47
		4.6.5	Chlorine-36	4-55
		4.6.6	Cesium-137	
		4.6.7	Tritium	4-67
		4.6.8	Iodine-129	4-70
		4.6.9	Niobium-94	4-75
		4.6.10	Neptunium-237	4-77
		4.6.11	Protactinium-231	4-79
		4.6.12	Lead-210	4-80
		4.6.13	Plutonium	4-81
		4.6.14	Plutonium Special Study	4-109
		4.6.15	Summary of Plutonium	
		4.6.16	Radium-226	
		4.6.17	Strontium-90	
		4.6.18	Technetium-99	
		4.6.19		4-140
		T.U. 1 /	V1WHWIII	T 1 TV

	4.7	Inorganic C	Contaminants	4-174
		4.7.1	Nitrates	4-174
	4.8	Volatile Or	ganic Compounds	4-179
		4.8.1	Carbon Tetrachloride	4-179
		4.8.2	Tetrachloroethylene	4-201
		4.8.3	Methylene Chloride	4-204
	4.9	Contamina	nts of Ecological Concern	4-206
		4.9.1	Radionuclides of Ecological Concern	4-206
		4.9.2	Inorganics of Ecological Concern	4-208
		4.9.3	Organics of Ecological Concern	4-209
	4.10	Nature and	Extent of Contamination Summary	4-210
		4.10.1	Vadose Zone	
		4.10.2	Aquifer	
		4.10.3	Integrated Assessment	
		4.10.4	Discussion and Conclusions	4-225
	4.11	References		4-226
5.	CON	TAMINAN	Γ FATE AND TRANSPORT	5-1
	5.1	Source Rele	ease Modeling	5-1
		5.1.1	Source Term Inventory	5-3
		5.1.2	Container Failure Rates	
		5.1.3	Release Mechanisms and Release Rates	5-4
		5.1.4	Contaminant Grouping for Modeling	
		5.1.5	Simulated Source Areas	5-20
		5.1.6	Infiltration Rates	5-25
		5.1.7	Source Term Model Calibration	5_27
	5.2	Dissolved-l	Phase Transport Modeling	5-27
		5.2.1	Dissolved-Phase Flow and Transport Conceptual Model	
		5.2.2	Predecessor Model, the Interim fisk Assessment	
		5.2.3	Overview of Improvements to the Interim Risk Assessment Model	5-29
		5.2.4	Baseline Model Development and Description	
		5.2.5	Base Case Simulations for the Baseline Risk Assessment	5-92
		5.2.6	Baseline Risk Assessment Sensitivity Simulations	5-112
		5.2.7	Simulation Nomenclature	5-119
	5.3	Volatile Or	ganic Compound Modeling	5-122
		5.3.1	Interim Risk Assessment Volatile Organic Contaminant Modeling	_
			and Results	5 _122

		5.3.2	Revised Volatile Organic Compound Inventory Estimates	5-123
		5.3.3 5.3.4	Implications of Revised Volatile Organic Compound Inventories Impact of Vapor Vacuum Extraction on Volatile Organic Compound	.5-124
			Concentrations	5-128
	5.4	Biotic Trans	sport	5-129
		5.4.1	Biotic Model Methodology	. 5-129
		5.4.2	Methodology for Determining DOST OMAN Rate Constants	. 5-132
		5.4.3	Flora—Current Scenario	5-133
		5.4.4	Flora—100+-Year Scenario	5-134
		5.4.5	Fauna—Current Scenario	5-137
		5.4.6	Fauna—100+-Year Scenario	
		5.4.7	Biotic Model Calibration.	
		5.4.8	Summary	. 5-142
	5.5	Summary a	nd Conclusions	5-143
	5.6	References.		5-147
6.	BAS	ELINE RISK	ASSESSMENT	. 6-1
	6.1	Assumption	ns for Baseline fisk Assessment	6-1
	6.2	Human Hea	alth Exposure Assessment	. 6-2
		6.2.1	Exposure Scenarios and Conceptual Site Model	6-2
		6.2.2	Media Concentrations	
		6.2.3	Quantification of Exposure	6-7
	6.3	Toxicity Pro	ofiles for Human Health Contaminants of Potential Concern	6-13
		6.3.1	Chemicals	6-14
		6.3.2	Radionuclides	6-17
	6.4	Risk Charac	cterization	6-22
		6.4.1	Generalized Approach	6-23
		6.4.2	Estimates of the Potential Human Health <b>fisk</b>	6-24
		6.4.3	fisk and Concentration Plots	6-47
	6.5	Uncertaintie	es in the Human Health Baseline <b>fisk</b> Assessment	6-73
		6.5.1	Scenario Uncertainty	6-73
		6.5.2	Model Uncertainty	6-73
		6.5.3	Parameter Uncertainty	6-74
	6.6	Ecological	fisk Assessment	6-90
		6.6.1	Introduction	6-90
		6.6.2	Waste Area Group 7 Ecological Characterization	6-91
		663	Contaminants of Ecological Concern	6-100

		6.6.4	Exposure Analysis	6-103
		6.6.5	Ecological fisk Estimates	6-109
		6.6.6	Ecological fisk Evaluation	6-115
	6.7	References		6-117
7	SUM	MARY AND	O CONCLUSIONS OF THE ANCILLARY BASIS FOR	
	RISK	ANALYSIS	5	7-1
	7.1	Summary		7-1
		7.1.1	Nature and Extent of Contamination	
		7.1.2	Contaminant Fate and Transport	
		7.1.3	Baseline Risk Assessment	7-3
	7.2	Conclusion	18	7-5
	7.3	References		7-33
8	REFI	ERENCES		8-1
			FIGURES	
1-1	Rel	ief man of th	e Idaho National Engineering and Environmental Laboratory showing	
		•	Radioactive Waste Management Complex. other facilities. and	
	cor	responding w	vaste area groups	1-4
1-2.	Ma	p of the Radi	ioactive Waste Management Complex	1-5
2-1.	Loc	cation of the	Idaho National Engineering and Environmental Laboratory on the	
	Sna	ake fiver Pla	in Aquifer in Idaho	2-3
2-2.			ste Area Group 7 relative to the Idaho National Engineering and	
			Laboratory. the diversion dam on the Big Lost fiver. and the flood contro	
2-3.	•	C		
Z <b>-</b> 3.		. •	atures of the Radioactive Waste Management Complex and rain	2-6
2-4.	Wi	nd rose from	the Radioactive Waste Management Complex area for 1980through 198	22-8
2-5.	Cro	oss section tre	ending west to east through the Subsurface Disposal Area	2-11
2-6.	Cro	oss section tre	ending southwest to northeast through the Subsurface Disposal Area	2-12
2-7.	Sui	face water fe	eatures of the Idaho National Engineering and Environmental Laboratory.	2-16
<b>2-8</b> .	Loc	cations with e	elevated moisture above the B-C interbed	2-21
2 <b>-</b> 9.			elevated moisture above the C-D interbed	
∠-9.	LO	zauons with t	TIC VALEU MOISLUIE AUOVE ME C-D MICHUEU	2-22

2-10.	Groundwater level measurements for the area upgradient of the Radioactive Waste Management Complex	2-24
2-11.	Aquifer water level contours in the vicinity of the Radioactive Waste Management Complex based on data collected in March and April 2000	2-25
2-12.	Locations of neutron-probe access tubes and associated shallow tensiometers in the Subsurface Disposal Area	2-27
2-13.	Locations of boreholes instrumented with advanced tensiometers at the Radioactive Waste Management Complex	2-33
2-14.	Locations of suction lysimeters at the Radioactive Waste Management Complex	2-34
2-15.	Location of surface water features and select monitoring wells near the Radioactive Waste Management Complex	2-39
2-16.	Locations where tracer dye has been introduced at the Subsurface Disposal Area	2-40
2-17.	Distribution of iodine-129 in 2001 in the Snake Rive Plain Aquifer in the areas of the Idaho Nuclear Technology and Engineering Center and Central Facility Area	2-42
2-18.	Distribution of tritium in 2000 in the Snake fiver Plain Aquifer	2-43
2-19.	Distribution of chloride in 2000 in the Snake fiver Plain Aquifer	2-45
2-20.	Distribution of strontium-90 in 2001 in the Snake fiver Plain Aquifer in the areas of the Idaho Nuclear Technology and Engineering Center and Central Facilities Area	2-46
2-21.	Counties adjacent to the Idaho National Engineering and Environmental Laboratory	2-49
2-22.	Land ownership distribution in the vicinity of the Idaho National Engineering and Environmental Laboratory	2-52
3-1.	Map of collocated facilities analysis within Waste Area Group 7	. 3-2
3-2.	Past waste retrievals by five programs in 11 locations from the Subsurface Disposal Area	3-13
3-3.	Subsurface Disposal Area life spans of trenches, pits. Pad A. and soil vault rows	3-21
3-4.	Transuranic and low-level waste disposal locations in the Subsurface Disposal Area	3-25
3-5.	Example of a high-resolution geophysical electromagnetic survey at the Subsurface Disposal Area	3-66
3-6.	Example of a high-resolution geophysical magnetic survey at the Subsurface Disposal Area	3-67
3-7.	Vertical gradient magnetic data for the area surrounding Soil Vault Row 12	3-68

3-8.	Electromagnetic induction data for the area surrounding Soil Vault Row 12	3-68
3-9.	Probe suite used in the Subsurface Disposal Area probing project	3-73
3-10.	View of a typical probe suite deployed in the Subsurface Disposal Area	3-74
3-12.	Probe clusters installed in and around the depleted uranium focus area in the west end of Pit 10	3-81
3-13.	Probes installed in the organic sludge focus area in the eastern end of Pit 4	3-84
3-14.	Relationship of shallow soil gas survey and Type A probe placement in the east end of Pit 4	3-85
3-15.	Relationship of geophysical survey and Type A probe placement in the east end of Pit 4	3-85
3-16.	Probes installed in the americium and neptunium focus area in the central part of Pit 10	3-88
3-17.	Probes installed in the uranium and enriched uranium focus area in Pit 5	3-91
3-18.	Probes installed in the activated metal focus area	3-95
3-19.	Probes installed to develop the waste zone moisture monitoring array	3-97
3-20.	Locations at the Subsurface Disposal Area showing significant temporary accumulations of surface water during February 1995	3-99
3-21.	Frequency distribution of batch plutonium $K_d$ values measured by Newman et al. (1996) differentiated by the valence state of plutonium in the starting solution	3-104
3-22.	Neptunium adsorption on Sample I1S-INEEL-109 comparing the fit of Freundlich, Langmuir. and linear isotherms to the laboratory data	3-107
3-23.	Laboratory neptunium adsorption data for three soil samples showing the similar slopes when fit with a Freundlich isotherm	3-108
3-24.	Photograph and cross-sectional view of an Advanced Test Reactor beryllium reflector block	3-111
3-27.	Concentrations of airborne tritiated water vapor above the beryllium blocks buried in Soil Vault Row 20	3-115
3-28.	Concentrations of tritiated water in soil moisture collected from a depth of 2.7 m (9 ft) near activated beryllium in Soil Vault Row 20	3-118
3-29.	Concentration of tritiated water in soil moisture collected from a depth of 4.5 m (15 ft) near activated beryllium in Soil Vault Row 20	3-119

3-30.	Concentration of tritiated water in soil moisture collected from a depth of 6.2 m (20 ft) near activated beryllium in Soil Vault Row 20	3-120
3-31.	Correlation of concentrations of tritiated water in soil moisture collected from depths of 4.5 and 6.2 m (15 and 20 ft)	3-121
4-1.	Depth intervals analyzed in the evaluation of the nature and extent of contamination for Waste Area Group 7	. 4-2
4-2.	Locations of the Type A probes from which nuclear logging data were obtained	4-15
4-3.	Surface soil sampling locations around the Radioactive Waste Management Complex	4-17
4-4.	Surface soil sampling locations at the Subsurface Disposal Area	4-18
4-5.	Surface soil sampling locations at the Transuranic Storage Area	4-19
4-6.	Vegetation sampling areas at the Radioactive Waste Management Complex	4-19
4-7.	Surface water runoff sampling locations at the Radioactive Waste Management Complex	4-20
4-8.	Shallow lysimeters located at depths from 0 to 35 ft	4-20
4-9.	Lysimeters located in the intermediate vadose zone at depths ranging from 35 to 140 ft	4-2 1
4-10.	Lysimeters and bailers located in the deep vadose zone at depths greater than 140 ft	4-22
4-11.	Locations of core samples collected at the Radioactive Waste Management Complex	4-23
4-12.	Radioactive Waste Management Complex aquifer monitoring wells	4-23
4-13.	Shallow lysimeter monitoring results for americium-241	4-38
4-14.	Intermediate-depth (35 to 140 ft) lysimeter monitoring results for americium-241	4-39
4-15.	Aquifer monitoring results of americium-241 in Idaho National Engineering and Environmental Laboratory and U.S. Geological Survey wells from 1992 through 2001	4-43
4-16.	Aquifer americium-241 monitoring results from the U.S. Geological Survey, 1972 through 1991	4-44
4-17.	Locations of americium-241 detections in vadose zone core, lysimeters. and the aquifer	4-46
4-18.	Occurrence of carbon-14 in shallow lysimeters (in pink)	4-50
<b>4-</b> 19.	Occurrence of carbon-14 detections in the aquifer monitoring wells. 1994through April 2001	4-54
4-20.	Locations of wells and lysimeters with detected concentrations of carbon-14	4-55

4-21.	Occurrences of cesium-137 detections in the shallow lysimeters	4-60
4-22.	Occurrences of cesium-137 detections in the aquifer monitoring wells from 1992 through 2001	4-62
4-23.	Occurrences of cesium-137 detections in the aquifer monitoring wells from 1972 through 1991	4-64
4-24.	Distribution of cesium-137 in the various sampled depths in the vadose zone and aquifer	4-66
4-25.	Tritium concentration in soil moisture at 20.3-ft depth	4-69
4-26.	Occurrences of iodine-129 detections in shallow lysimeter wells	4-73
4-27.	Locations where iodine-129 was detected in lysimeter and well samples	4-75
4-28.	Occurrence of plutonium-238 in shallow lysimeter	4-90
4-29.	Occurrence of plutonium-239/240 detections in shallow lysimeters	4-91
4-30.	Occurrence of detectable plutonium-238 (in pink) in lysimeter samples from the 35 to 140-ft depth interval	4-93
4-31.	Occurrence of plutonium-239/240 detections in lysimeter samples from 35 to 140-ft deep	4-94
4-32.	Occurrence of plutonium-238 in aquifer samples collected by the Idaho National Engineeri and Environmental Laboratory and U.S. Geological Survey from 1992through 2001	
4-33.	Occurrences of plutonium-238 in aquifer samples collected by the U.S. Geological Survey from 1972through 1991	4-103
4-34.	Occurrence of detectable Pu-239/240 in aquifer samples collected by the Idaho National Engineering and Environmental Laboratory and U.S. Geological Survey from 1992 through 2001	4-105
4-35.	Occurrence of Pu-239/240 in wells monitored by the <b>U.S.</b> Geological Survey from 1972 through 1991	4-107
4-36.	Distribution of Plutonium-238 detections in the various sampled media	4-113
4-37.	Distribution of Pu-239/240 detections in the various sampled media	4-114
4-38.	Shallow lysimeter monitoring results for radium-226	4-118
<b>4-</b> 39.	Aquifer monitoring detections for radium.226	4-120

4-40.	Locations of vadose zone core, lysimeter and aquifer samples with detectable concentration of radium-226, by depth interval	as 4-122
4-41.	Occurrence of strontium-90 in shallow lysimeter samples	.4-126
4-42.	Occurrence of detectable concentrations of strontium-90 in aquifer samples, 1992 through April 2001	4-128
4-43.	Occurrence of detectable concentrations of strontium-90 from 1972 through 1991 in the U.S. Geological Survey aquifer samples	129
4-44.	Locations of vadose zone core, lysimeter and aquifer samples with detectable concentration of strontium-90, by depth interval	ıs 4-132
4-45.	Occurrence of technetium-99 detections in shallow lysimeters	.4-136
4-46.	Aquifer monitoring detections of technetium-99, 1994through April 2001	.4-139
4-47.	Locations of vadose zone core, lysimeter and aquifer samples with detectable concentration of technetium-99, by depth interval	is 4-141
4-48.	Soil moisture sample concentrations of uranium-233/234 in shallow lysimeters	.4-152
4-49.	Occurrence of uranium-233/234 detections at or near background (3 pCi/L), and detections greater than 1E-05 aquifer risk-based concentration (6.7 pCi/L) in shallow lysimeters	.4-153
4-50.	Soil moisture sample concentrations of uranium-235/236 in shallow lysimeters. (Note: Nondetected concentrations also are shown. Also see 4-51, in which detected concentrations are identified for each well.)	.4-154
4-51.	Occurrence of uranium-235/236 nondetections, detections at or above background (0.5 pCi/L), and detections greater than 1E-05 aquifer risk-based concentration (6.6 pCi/L) in shallow lysimeters.	.4-155
4-52.	Soil moisture sample concentrations of uranium-238 in shallow lysimeters	.4-156
4-53.	Occurrence of uranium-238 nondetections, detections at or above background (1.5 pCi/L), and detections greater than 1E-05 aquifer risk-based concentration (5.5 pCi/L) in shallow lysimeters	.4-157
4-54.	Soil moisture sample concentrations of uranium-233/234 in mid-depth lysimeters	.4-158
4-55.	Occurrence of uranium-233/234 nondetections, detections at or above background (3 pCi/L and detections greater than 1E-05 aquifer risk-based concentration (6.7 pCi/L) in mid-depth lysimeters	1
4-56.	Soil moisture sample concentrations of uranium-235/236 measured in mid-depth lysimeters	.4-160

4-57.	Occurrence of uranium-235/236 nondetections, detections at or above background (0.5 pCi/L), and detections greater than the 1E-05 aquifer risk-based concentration of 6.6 pCi/L in mid-depth lysimeters	.4-161
4-58.	Soil moisture sample concentrations of uranium-238 measured in mid-depth lysimeters	.4-162
4-59.	Occurrence of uranium-238 nondetections, detections at or above background, and detections greater than the 1E-05 aquifer risk-based concentration in mid-depth lysimeter samples.	.4-163
4-60.	Occurrence of uranium-233/234 nondetections and detections at or above background in aquifer wells monitored by the Idaho National Engineering and Environmental Laboratory.	4-166
4-61.	Occurrence of uranium-235/236 nondetections and detections at or above background in aquifer wells monitored by the Idaho National Engineering and Environmental Laboratory.	.4-167
4-62.	Occurrence of uranium-238 nondetections and detections at or above background in aquifer wells monitored by the Idaho National Engineering and Environmental Laboratory	
4-63.	The distribution of detected uranium-233/234 above background in the vadose zone core, lysimeter, perched water, and aquifer samples at the Radioactive Waste Management Complex	.4-170
4-64.	The distribution of uranium-235/236 positive detections greater than background levels in vadose zone cores, soil moisture, perched water and aquifer samples at the Radioactive Waste Management Complex	.4-171
4-65.	The distribution of uranium-238 positive detections greater than background levels in vadose zone cores, soil moisture, perched water, and aquifer samples at the Radioactive Waste Management Complex	.4-172
4-66.	Nitrate concentrations in Well M6S from 1992 to 2001	4-178
4-67.	Map of the Subsurface Disposal Area showing relative drum burial densities for 743-series waste drums	.4-181
4-68.	Surface flux chamber measurement locations	.4-184
4-69.	Carbon tetrachloride concentrations (ppmv) in shallow soil gas measured during the 2000 shallow soil gas survey	4-185
4-70.	Locations of wells in the vicinity of the Subsurface Disposal Area with permanent vapor sampling ports	.4-187
4-71.	Vapor sampling port depths and numbers	.4-188
4-72.	Conceptual drawing of the carbon tetrachloride soil gas plume prior to vapor vacuum extraction operations	.4-189

4-73.	Profiles of carbon tetrachloride soil gas vertical concentrations for Wells 8801, 9301, and 9302, near the center of the Subsurface Disposal Area averaged over the period from April 1993 to October 1995, excluding data collected during the 1993 organic contamination in the vadose zone treatability study	.4-190
4-74.	Profiles of carbon tetrachloride soil gas concentrations for V- and VVE-series wells averaged over the period from January 1995 to October 1995	4-191
4-75.	Carbon tetrachloride soil gas concentration time history for selected ports in Well 8801	4-193
4-76.	Carbon tetrachloride soil gas concentration time history for selected ports in Well 9301	4-194
4-77.	Carbon tetrachloride soil gas concentration time history for selected ports in Well 9V	4-195
4-78.	Comparison of initial carbon tetrachloride concentrations at the 21-m (70-ft) depth with concentrations after 5 years of vapor vacuum extraction	.4-196
4-79.	Carbon tetrachloride concentrations in perched water in Wells USGS-92 and 8802D	4-197
4-80.	Bubble plot showing maximum carbon tetrachloride concentrations in aquifer in Subsurface Disposal Area vicinity monitoring wells	.4-199
4-81.	Carbon tetrachloride aquifer concentrations in monitoring wells in the vicinity of the Subsurface Disposal Area	4-200
4-82.	Areas with the most frequent statistically positive detections of contamination in the vadose zone	.4-210
4-83.	Americium-241 detections in the vadose zone and aquifer around the Subsurface Disposal Area	4-214
4-84.	Carbon-14 detections in the vadose zone and aquifer around the Subsurface Disposal Area	.4-215
4-85.	Plutonium-238 detections in the vadose zone and aquifer around the Subsurface Disposal Area	.4-216
4-86.	Plutonium-239/240 detections in the vadose zone and aquifer near the Subsurface Disposal Area	.4-217
4-87.	Technetium-99 detections in the vadose zone and aquifer near the Subsurface Disposal Area	.4-219
4-88.	Uranium-233/234 detections in the vadose zone and aquifer near the Subsurface Disposal Area	4-220
4-89.	Uranium-235 detections above background in the vadose zone and aquifer near the Radioactive Waste Management Complex	.4-221

4-90.	Uranium-238 detections in the vadose zone and aquifer around the Radioactive Waste Management Complex	.4-222
5-1	The 13 source areas simulated in the source release model and specifically represented in the subsurface model domain	.5-21
5-2.	Infiltration rates assigned in the subsurface flow model and averages used for the 13 source areas simulated in the source release model	5-26
5-3.	Horizontal domains considered for simulation of vadose zone flow and transport	5-34
5-4.	Horizontal discretization for the vadose zone model domain	.5-36
5-5.	The top plot shows the final kriged results for elevations (ft amsl) of surficial sediments for the second level of grid refinement. The bottom plot shows uncertainty (standard error) in the elevations of surficial sediments for the same grid	5-43
5-6.	Kriged results for the A-B interbed thickness (ft) on the second level of grid refinement. Colored markers indicate locations of zero thickness. The lower plot has only colored marker for zero thickness locations and the matrix of kriging results are superimposed. Note the persistence of locations with zero thickness into the kriging results	ers .5-44
5-7.	Kriged results for the B-C interbed thickness (ft) on the first level of grid refinement. Colored markers indicate locations of zero thickness. The lower plot has only colored markers for zero thickness locations and the matrix of kriging results are superimposed. Note the lack of persistence of locations with zero thickness into kriging results	5-45
5-8.	Kriged results for the elevation of the top surface of the C-D interbed for the initial vadose zone base grid. Note an interpolated saddle feature between Wells M3S and M7S and a trough feature leading southeasterly from the Subsurface Disposal Area toward Well M6S	5-46
5-9.	Southwest and northeast views of base grid beneath the Subsurface Disposal Area showing vertical conformable gridding. The vertical extent shows the entire vadose zone simulation domain. Interbed grids are shaded green and fractured basalt grids are shaded gray	5-48
5-10.	Southwest and northeast views of first-level refined grid showing vertical conformable gridding. The first level of grid refinement extended to the base of the B-C interbed beneath the Subsurface Disposal Area.	.5-48
5-11.	Southwest view of the second-level refined grid showing vertical conformable gridding. The second level of grid refinement extended to the base of the A-B interbed beneath the Subsurface Disposal Area. Note the A-B interbed merging with the surficial sediments	5-49
5-12.	Kriged porosity and permeability (mD) for the B-C interbed	.5-51
5-13.	Kriged porosity and permeability (mD) for the C-D interbed	5-52

5-14.	Spatially variable infiltration assignment for model domain inside the Subsurface Disposal Area	5-53
5-15.	Locations of additional water supplied by the 1962, 1969. and 1982 flooding events at the Subsurface Disposal Area	5-54
5-16.	Tensiometric monitoring results in Well 76-5 during the winter and spring of 1999	5-55
5-17.	Simulation grid for Well 76-1 with lithology and tensiometer monitoring locations	5-56
5-18.	Three moisture characteristic curves used in Well 76-5 infiltration simulation. The red asterisks represent the Corey-type moisture characteristic curve used in the ABRA simulations. The other two curves are an alternate Corey-type curve (blue diamonds) and a van Genuchten curve (green Xs)	5-57
5-19.	Simulated matric potentials for the three moisture characteristic curves	5-58
5-20.	Simulated water fluxes at 11.6-m (38-ft) depth beneath a thin interbed for the three moisture characteristic curves using first-type prescribed saturation conditions for melting events	5-60
5-21.	Simulated water fluxes at 11.6-m (38-ft) depth for the three moisture characteristic curves using second-type prescribed flux conditions for the melting events	5 <b>-</b> 60
5-22.	Transient simulation results with water applied at Spreading Area A	5-61
5-23.	Transient simulation results with water applied at Spreading Area B	5-62
5-24.	Relative presence of spreading-area water with 1 acre-ft/day steady-state application. (This simulation was selected for the baseline risk assessment base case.)	5-63
5-25.	Relative presence of spreading-area water with 2 acre-ft/day steady-state application	5-63
5-26.	Relative presence of spreading-area water with 3 acre-ft/day steady-state application	5-64
5-27.	Relative presence of spreading-area water with 4 acre-ft/day steady-state application	5-64
5-28.	Relative presence of spreading-area water with 8 acre-ft/day steady-state application	5-65
5-29.	Historical diversion of Big Lost fiver water to the spreading areas from 1965 through 1999	5-65
5-30.	Water travel times in years through the vadose zone for the Ancillary Basis for fisk Analysis simulation (top) and for a case without an assumed spreading area influence (bottom)	5-67
5-31.	Simulated water travel times from the Interim Risk Assessment model	5-68

5-32.	The upper plot shows the maximum simulated water saturation in the B-C interbed in calendar year 2001 and the lower plot shows the maximum simulated water saturation in the C-D interbed in calendar year 2001	5-69
5-33.	Fitted linear and nonlinear isotherms for neptunium for sample 7DS00501	5-71
5.34 .	$\label{eq:cumulative} Cumulative\ frequency\ distribution\ of\ uranium\ K_d\ values\ measured\ on\ Subsurface$ $\ Disposal\ Area\ sedimentary\ interbed\ samples\$	5-72
5-35.	$\label{eq:cumulative} Cumulative\ frequency\ distribution\ of\ neptunium\ K_d\ values\ measured\ on\ Subsurface$ $\ Disposal\ Area\ sedimentary\ interbed\ samples\$	5-72
5-36.	Cumulative frequency distribution of plutonium $K_{\rm d}$ values measured on Idaho National Engineering and Environmental Laboratory soil and sedimentary interbed materials by Newman and Dunnivant (1995).	5-73
5-37.	Water table map generated with deviation-corrected data from March and April 2000.  Also shown is the base aquifer simulation domain	5-76
5-38.	Aquifer simulation domain with one level of refinement to match vadose zone model	.5-76
5-39.	Best-fitted simulated water levels for base and refined grid	5-78
5-40.	Final aquifer permeability set used for the baseline risk assessment model	5-79
5-41.	Simulated groundwater average linear velocities (dyear) for the base and refined simulation domains	5-80
5-42.	Large and small area application regions for spreading area water into the aquifer simulation domain	5-81
5-43.	Simulated water levels for the base and refined aquifer domain for the large area application of spreading-area water	5-83
5-44.	Simulated water levels for the base and refined aquifer domain for the small area application of spreading-area water	5-84
5-45.	Simulated groundwater average linear velocities (dyear) in the refined simulation domain with additional water applied at the spreading areas	5-85
5-46.	Comparison of simulated and observed nitrate (as N) concentration time histories for aquifer monitoring wells in the vicinity of the Subsurface Disposal Area	5-87
5-47.	Simulated and observed nitrate concentrations superimposed onto monitoring locations in the vicinity of the Radioactive Waste Management Complex	5-89
5-48.	Simulated aquifer nitrate concentrations for calendar year 2001	5-90

5-49.	Simulated aquifer nitrate concentration profile beneath the Subsurface Disposal Area for calendar year 2001	.5-91
5-50.	Comparison of simulated and observed chromium concentration time histories for aquifer monitoring wells in the vicinity of the Subsurface Disposal Area	.5-93
5-51.	Comparison of simulated and observed 1-129 concentration time histories for aquifer monitoring wells in the vicinity of the Subsurface Disposal Area	.5-96
5-52.	Comparison of simulated and observed technetium-99 concentration time histories for aquifer monitoring wells in the vicinity of the Subsurface Disposal Area	.5-98
5-53.	Comparison of simulated and observed Am-241 concentration time histories for aquifer monitoring wells in the vicinity of the Subsurface Disposal Area	5-100
5-54.	Comparison of simulated and observed Np-237 concentration time histories for aquifer monitoring wells in the vicinity of the Subsurface Disposal Area	5-102
5-55.	Comparison of simulated and observed Pu-238 concentration time histories for aquifer monitoring wells in the vicinity of the Subsurface Disposal Area	5-104
5-56.	Comparison of simulated and observed Pu-239 and Pu-240 concentration time histories for aquifer monitoring wells in the vicinity of the Subsurface Disposal Area	5-106
5-57.	Comparison of simulated and observed C-14 concentration time histories for aquifer monitoring wells in the vicinity of the Subsurface Disposal Area	5-108
5-58.	The B-C interbed kriged thicknesses with shaded locations where gaps were superimposed	.5-113
5-59.	Simulated vadose zone water travel times when gaps are included in the B-C interbed	.5-113
5-60.	Comparison of simulated Pu-238 B-C interbed soil concentrations (Ci/g) for the base simulation to the Pu-238 $K_d$ sensitivity simulations.	5-115
5-61.	Comparison of simulated Pu-239 B-C interbed soil concentrations (Ci/g) for the base simulation and the Pu-238 $K_{\rm d}$ sensitivity simulations	5-115
5-62.	Simulated 12-m(39-ft) depth Pu-238 and Pu-239 aquifer concentrations (pCi/L) at calendar year 2001 for the simulation with a 1 x 10 <sup>-6</sup> mobile fraction	5-117
5-63.	Simulated vadose zone water travel times (years) with a uniform infiltration rate of 8.5 cm/year (3.3 in./year) inside the Subsurface Disposal Area	5-119
5-64.	Comparison of carbon tetrachloride release rates using the Interim fisk Assessment inventory ( $2\times$ ) and the preliminary $5\times$ inventory estimate	5-125
5-65.	Comparison of carbon tetrachloride cumulative release using the Interim fisk Assessment inventory ( $2\times$ ) and the preliminary $5\times$ inventory estimate	5-126

5-66.	Comparison of simulated carbon tetrachloride concentrations in the aquifer near Well M10S for the Interim Risk Assessment and revised inventory estimates	5-127
5-67.	DOSTOMAN biotic modeling	5-131
6-1.	Human health conceptual site model	6-4
6-2.	Total carcinogenic risks for all radionuclides for hypothetical hture residential exposure pathways	6-27
6-3.	Carbon-14 carcinogenic risks for hypothetical hture residential scenario exposure pathways	.6-27
6-4.	Neptunium-237 carcinogenic risks for hypothetical hture residential exposure pathways	6-28
6-5.	Strontium-90 carcinogenic risks for hypothetical hture residential exposure pathways	6-28
6-6.	Technetium-99 carcinogenic risks for hypothetical hture residential exposure pathways	6-29
6-7.	Uranium-234 carcinogenic risks for hypothetical hture residential exposure pathways	6-29
6-8.	Uranium-235 carcinogenic risks for hypothetical hture residential exposure pathways	6-30
6 <b>-</b> 9.	Uranium-236 carcinogenic risks for hypothetical hture residential exposure pathways	6-30
6-10.	Uranium-238 carcinogenic risks for hypothetical hture residential exposure pathways	6-31
6-11.	Carbon tetrachloride carcinogenic risks for hypothetical hture residential exposure pathways	6-31
6-12.	Tetrachloroethylenecarcinogenic risks for hypothetical hture residential exposure pathways	6-32
6-13.	Carbon tetrachloride hazard index for hypothetical hture residential exposure pathways	6-32
6-14.	Nitrate hazard index for hypothetical hture residential exposure pathways	6-33
6-15.	Tetrachloroethylenehazard quotient for the hypothetical hture residential scenario	6-33
6-16.	Actinium-227 carcinogenic risks for hypothetical hture residential exposure pathways	6-34
6-17.	Americium-241 carcinogenic risks for hypothetical hture residential exposure pathways	6-34
6-18.	Chlorine-36 carcinogenic risks for hypothetical hture residential exposure pathways	6-35
6-19.	Cesium-137 carcinogenic risks for hypothetical hture residential exposure pathways	6-35
6-20.	Iodine-129 carcinogenic risks for hypothetical hture residential exposure pathways	6-36
6-21.	Niobium-94 carcinogenic risks for hypothetical hture residential exposure pathways	6-36

6-22.	Protactinium-231 carcinogenic risks for hypothetical hture residential exposure pathways	6-37
6-23.	Plutonium-239 carcinogenic risks for hypothetical hture residential exposure pathways	6-37
6-24.	Plutonium-240 carcinogenic risks for hypothetical hture residential exposure pathways	6-38
6-25.	Radium-226 carcinogenic risks for hypothetical hture residential exposure pathways	6-38
6-26.	Uranium-233 carcinogenic risks for hypothetical hture residential exposure pathways	6-39
6-27.	Methylene chloride carcinogenic risks for hypothetical hture residential exposure pathways	6-39
6-28.	Isopleths of cumulative groundwater ingestion risk for radionuclides at the end of the simulated 100-year institutional control period for the refined aquifer grid	6-45
6-29.	Isopleths of cumulative groundwater ingestion risk for radionuclides at the end of the simulated 100-year institutional control period for the regional base aquifer grid	6-45
6-30.	Isopleths of peak cumulative groundwater ingestion risk for radionuclides for the refined aquifer grid	6-46
6-31.	Isopleths of peak cumulative groundwater ingestion risk for radionuclides for the regional base aquifer grid	6-46
6-32.	Simulated maximum groundwater concentrations for Group 1 contaminants for 1,000 years	6-47
6-33.	Total carcinogenic risk for Group 1 contaminants for hypothetical hture residential exposure pathways	6-48
6-34.	Simulated maximum groundwater concentrations for Group 1 contaminants over 10,000 years	6-48
6-35.	Simulated maximum groundwater ingestion risks for Group 1 contaminants over 10,000 years anywhere in the aquifer	6-49
6-36.	Simulated maximum groundwater concentrations for Group 1 contaminants over 10.000 years at the southern Idaho National Engineering and Environmental Laboratory boundary	6-49
6-37.	Simulated maximum groundwater ingestion risks for Group 1 contaminants over 10,000 years at the southern Idaho National Engineering and Environmental Laboratory boundary	6-50
6-38.	Simulated soil concentrations for Group 1 contaminants	6-50
6-39.	Simulated maximum groundwater concentrations for Group 2 contaminants over 1.000 years	6-51

6-40.	exposure pathways	.6-5
6-41.	Simulated maximum groundwater concentrations for Group 2 contaminants over 10,000 years	6-52
6-42.	Simulated maximum groundwater ingestion risks for Group 2 contaminants over 10,000 years anywhere in the aquifer	6-52
6-43.	Simulated maximum groundwater concentrations for Group 2 contaminants over 10,000 years at the southern Idaho National Engineering and Environmental Laboratory boundary	.6-5
6-44.	Simulated maximum groundwater ingestion risks for Group 2 contaminants over 10,000 years at the southern Idaho National Engineering and Environmental Laboratory boundary	.6-5
6-45.	Simulated soil concentrations for Group 2 contaminants	.6-54
6-46.	Simulated maximum groundwater concentrations for Group 3 contaminants over 1,000 years	6-54
6-47.	Total carcinogenic risk for Group 3 contaminants for hypothetical hture residential exposure pathways	.6-5
6-48.	Simulated maximum groundwater concentrations for Group 3 contaminants over 10,000 years	6-5:
6-49.	Simulated maximum groundwater ingestion risks for Group 3 contaminants over 10,000 years anywhere in the aquifer	6-5
6-50.	Simulated maximum groundwater concentrations for Group 3 contaminants over 10,000 years at the southern Idaho National Engineering and Environmental Laboratory boundary	.6-5
6-51.	Simulated maximum groundwater ingestion risks for Group 3 contaminants over 10,000 years at the southern Idaho National Engineering and Environmental Laboratory boundary.	.6-5
6-52.	Simulated soil concentrations for Group 3 contaminants	.6-5
6-53.	Simulated maximum groundwater concentrations for Group 4 contaminants over 1,000 years	6-5
6-54	Total carcinogenic risk for Group 4 contaminants for hypothetical hture residential exposure pathways	.6-5
6-55	Simulated maximum groundwater concentrations for Group 4 contaminants over 10,000 years	6-5

6-56.	Simulated maximum groundwater ingestion risks for Group 4 contaminants over 10,000 years anywhere in the aquifer	6-59
6-57.	Simulated maximum groundwater concentrations for Group 4 contaminants over 10,000 years at the southern Idaho National Engineering and Environmental Laboratory boundary	6-60
6-58.	Simulated maximum groundwater ingestion risks for Group 4 contaminants over 10,000 years at the southern Idaho National Engineering and Environmental Laboratory boundary	6-60
6-59.	Simulated soil concentrations for Group 4 contaminants	.6-61
6-60.	Simulated maximum groundwater concentrations for Group 5 contaminants over 1,000 years	6-61
6-61.	Total carcinogenic risk for Group 5 contaminants for hypothetical future residential exposure pathways	.6-62
6-62.	Simulated maximum groundwater concentrations for Group 5 contaminants over 10,000 years	6-62
6-63.	Simulated maximum groundwater ingestion risks for Group 5 contaminants over 10,000 years anywhere in the aquifer	6-63
6-64.	Simulated maximum groundwater concentrations for Group 5 contaminants over 10,000 years at the southern Idaho National Engineering and Environmental Laboratory boundary	.6-63
6-65.	Simulated maximum groundwater ingestion risks for Group 5 contaminants over 10,000 years at the southern Idaho National Engineering and Environmental Laboratory boundary	.6-64
6-66.	Simulated soil concentrations for Group 5 contaminants	.6-64
6-67.	Simulated maximum groundwater concentrations for Group 6 contaminants over 1,000 years	6-65
6-68.	Hazard index for Group 6 contaminants for hypothetical hture residential exposure pathways	.6-65
6-69.	Simulated maximum groundwater concentrations for Group 6 contaminants over 10,000 years	6-66

6-70.	Simulated maximum groundwater hazard quotient for Group 6 contaminants over 10,000 years anywhere in the aquifer
6-71.	Simulated maximum groundwater concentrations for Group 6 contaminants over 10,000 years at the southern Idaho National Engineering and Environmental Laboratory boundary
6-72.	Simulated maximum groundwater ingestion hazard quotient for Group 6 contaminants over 10,000 years at the southern Idaho National Engineering and Environmental Laboratory boundary
6-73.	Simulated soil concentrations for Group 6 contaminants
6-74.	Simulated maximum groundwater concentrations for Group 7 contaminants over 1,000 years
6-75.	Total carcinogenic risk for Group 7 contaminants for hypothetical hture residential exposure pathways
6-76.	Simulated maximum groundwater concentrations for Group 7 contaminants over 10,000 years
6-77.	Simulated maximum groundwater ingestion risks for Group 7 contaminants over 10,000 years anywhere in the aquifer
6-78.	Simulated maximum groundwater ingestion risks for Group 7 contaminants over 10,000 years at the southern Idaho National Engineering and Environmental Laboratory boundary
6-79.	Simulated maximum groundwater ingestion risks for Group 7 contaminants over 10,000 years at the southern Idaho National Engineering and Environmental Laboratory boundary
6-80.	Simulated soil concentrations for Group 7 contaminants
6-81.	Simulated soil concentrations for Group 8 contaminants
6-82.	Total carcinogenic risk for Group 8 contaminants for hypothetical hture residential exposure pathways
6-83.	Comparison of the estimated groundwater ingestion risk for the best-estimate and upper-bound inventories.
6-84.	Comparison of the estimated plutonium-239 groundwater ingestion risks for plutonium mobility sensitivity cases
6-85.	Comparison of the estimated plutonium-238 groundwater ingestion risk for plutonium mobility sensitivity cases

6-86.	Comparison of the estimated plutonium-239 groundwater ingestion risk for mobile fraction sensitivity	.6-83
6-87.	Comparison of the estimated plutonium-238 groundwater ingestion risk for mobile fraction sensitivity	.6-83
6-88.	Comparison of the estimated uranium-238 groundwater ingestion risk for selected uranium solubility	.6-84
6-89.	Comparison of the estimated neptunium-237 groundwater ingestion risk for neptunium solubility sensitivity cases	.6-85
6-90.	Comparison of the estimated total groundwater ingestion risk for spreading area influence sensitivity cases	.6-86
6-91.	Comparison of the estimated total groundwater ingestion risk for infiltration rates sensitivity cases	6-87
6-92.	Comparison of the estimated total groundwater ingestion risk for the B-C interbed gaps sensitivity case	.6-88
6-93.	Comparison of the estimated technetium-99 groundwater ingestion risk for differing release rates for Idaho National Engineering and Environmental Laboratory reactor operations waste disposal sensitivity cases	.6-89
6-94.	Model for ecological pathways and exposure for the Subsurface Disposal Area	6-107
6-95.	The Subsurface Disposal Area ecological conceptual site model	6-108
7-1.	Cumulative risk estimates for individual radionuclides for the hypothetical hture residential scenario	. 7-8
7-2.	Cumulative risk estimates for transuranic and nontransuranic contaminants of concern for the hypothetical hture residential scenario	.7-9
7-3.	Isopleths of cumulative groundwater ingestion risk at the end of the simulated 100-year institutional control period in 2110 for radionuclides	.7-10
7-4.	Isopleths of peak cumulative groundwater ingestion risk in 3112 for radionuclides	7-10
7-5.	Waste types and disposal locations in the Subsurface Disposal Area	7-20
<b>7-</b> 6.	Americium-241 disposal locations in the Subsurface Disposal Area	.7-21
7-7.	Carbon-14 disposal locations in the Subsurface Disposal Area based on a partial mapping data set	7-22
7-8.	Iodine-129 disposal locations in the Subsurface Disposal Area based on a partial mapping data set	7-23

7-9.	Niobium-94 disposal locations in the Subsurface Disposal Area based on a partial mapping data set	7-24
7-10.	Neptunium-237 disposal locations in the Subsurface Disposal Area based on a partial mapping data set	7-25
7-11.	Plutonium disposal locations in the Subsurface Disposal Area based on a partial mapping data set	7-26
7-12.	Strontium-90 disposal locations in the Subsurface Disposal Area based on a partial mapping data set	7-27
7-13.	Technetium-99 disposal locations in the Subsurface Disposal Area based on a partial mapping data set	7-28
7-14.	Uranium disposal locations in the Subsurface Disposal Area based on a partial mapping data set	7-29
7-15.	Carbon tetrachloride and tetrachloroethylene disposal locations in the Subsurface Disposal Area	7-30
7-16.	Methylene chloride disposal locations in the Subsurface Disposal Area	7-3 1
7-17.	Nitrate disposal locations in the Subsurface Disposal Area	7-32
	TABLES	
2-1	Names and common aliases for wells in the vicinity of the Radioactive Waste Management Complex	2-17
2-2	Neutron-probe access tubes in the Subsurface Disposal Area	2-28
2-3	Net infiltration estimates based on moisture content changes at neutron-probe access tubes in the Subsurface Disposal Area	2-30
2-4	Advanced tensiometers at the Radioactive Waste Management Complex	2-32
2-5	Suction lysimeters installed at the Radioactive Waste Management Complex	2-35
2-6	Population estimates for counties and selected communities surrounding the Idaho National Engineering and Environmental Laboratory (Census 2001)	2-50
2-7	Acreage by county of major crops harvested on land surrounding INEEL. 1999 to 2000 (Idaho 2000)	2-51
3-1	Areas and volumes of Subsurface Disposal Area trenches including overburden	3-26
3-2	Areas and volumes of Subsurface Disposal Area pits including overburden	3-28

3-3	Volumes of Subsurface Disposal Area soil vault rows including overburden	3-29
3-4	Estimated soil cover thickness	3-30
3-5	Subsidence data collected from 1996 to 2001 for the Subsurface Disposal Area	3-31
3-6	Operable units and sites in Waste Area Group 7	3-34
3-7	Comparison of estimated soil concentrations based on revised best-estimate inventories to ecologically based screening levels for radionuclide contaminants of potential concern	3-58
3-8	Comparison of best-estimate inventories and modeled concentrations to upper-bound inventories and modeled concentrations	3-60
3-9	Nonradionuclide ecological contaminants of potential concern identified by comparing estimated soil concentrations based on upper-bound inventories to ecologically based screening levels	3-61
3-10	Summary of Subsurface Disposal Area surface geophysical surveys	3-65
3-11	Minimum. maximum. and average soil cover thickness for Pits 4. 6. and 10 based on surface geophysical data	3-69
3-12	Summary of qualitative results from studies conducted at the Subsurface Disposal Area between 1959 and 1970	3-70
3-13	Probe completions. by cluster. in the west end of Pit 10 and the east end of Pit 4 supporting depleted uranium waste assessment	3-82
3-14	Probe completions. by cluster. in the organic sludge focus area in the east end of Pit 4	3-86
3-15	Probe completions. by cluster. supporting americium and neptunium waste assessment in Pit 10	3-89
3-16	Probe completions. by cluster. supporting uranium waste assessment in Pit 5	3-90
3-17	Probe completions supporting activated metal assessment	3-93
3-18	Probe completions in the waste zone moisture monitoring array at Pit 4 and Pit 10	3-98
3-19	Logging methods used to interpret the vertical waste boundaries	3 _100
3-20	Overburden and waste zone thickness estimates from Type A logging data	3-100
3-21	Summary of batch and column measurements of americium. plutonium. and uranium partition coefficients from Newman et al. (1996)	3-103
3-22	Summary of retardation and $K_d$ values measured in column experiments	3-106

3-23	Measured Freundlich and linear isotherm parameters for neptunium and uranium (Grossman et al. 2001)	3-108
3-24	Summary of the Advanced Test Reactor. Engineering Test Reactor and Materials Test Reactor transuranic and C-14 concentrations in irradiated beryllium reflector waste disposed of in the Subsurface Disposal Area as of the indicated disposal date	3-113
3-25	Summary of carbon-14 specific activity (pCi of carbon-14 per gram of carbon) in carbon dioxide in soil gas samples collected at Soil Vault Row 20	3-116
4-1.	Annual inventories (curies) of radionuclide contaminants of potential concern and associated long-lived decay chain products at the time of disposal in the Subsurface Disposal Area from 1952 to 1999	. 4-3
4-2.	Annual inventories (grams) of nonradionuclide contaminants of potential concern buried in the Subsurface Disposal Area from 1952 to 1999	. 4-9
4-3.	Decay chain for the thorium decay series, including anthropic predecessors from weapons manufacturing or reactor operations	4-11
4-4.	Decay chain for the neptunium series	4-12
4-5.	Decay chain for the uranium series and anthropic predecessors from weapons manufacturing or reactor operations	4-13
4-6.	Decay chain for the actinium series, including predecessors from weapons production or reactor operations	4-14
4-7.	Description of Type A probe logging tools	4-16
4-8.	Example of the application of uncertainty measurements to radiological data	4-27
<b>4-</b> 9.	Comparison concentrations for actinium-227 in soil and groundwater	4-33
4-10.	Actinium-227 waste streams and parent isotopes	4-33
4-11.	Comparison concentrations for americium-241 in soil and the aquifer	4-34
4-12.	Waste streams containing americium-241	4-35
4-13.	Positive detections of americium-241 in vadose zone core samples	4-36
4-14.	Americium-241 detections in vadose zone core samples from each depth interval	4-37
4-15.	Positive detections of americium-241 in shallow lysimeters in the 0- to 35-ft depth interval	4-37
4-16.	Positive detections of Am-241 in lysimeter samples from 35 to 140 ft	4-39

4-17.	Positive detections of americium-241 in deep perched water	4-4(
4-18.	Positive detections of americium-241 in the aquifer	4-40
4-19.	Positive detections of americium-241 in aquifer wells monitored by the <b>U.S.</b> Geological Survey	4-42
4-20.	Frequencies of americium-241 detection in sampled media	4-45
4-21.	Waste streams containing americium-243	4-47
4-22.	Comparison concentrations for carbon-14 in groundwater and soil	4-48
4-23.	Waste streams containing C-14	4-48
4-24.	Distribution of C-14 in vadose zone core samples in the various depth intervals	4-49
4-25.	Positive detections of carbon-14 in shallow lysimeters	4-49
4-26.	Positive detections of carbon-14 in perched water	4-5
4-27.	Positive detections of carbon-14 in aquifer wells	4-52
4-28.	Carbon-14 detection rates for the sampled media	4-53
4-29.	Comparison concentrations for chlorine-36 in groundwater and soils	4-55
<b>4-3</b> 0.	Waste streams containing chlorine-36	4-56
4-31.	Comparison concentrations for cesium-137 in groundwater and soil	4-56
4-32.	Waste streams containing cesium-137	4-57
4-33.	Positive detections of cesium-137 from vadose zone core samples	4-58
4-34.	Summary of Cs-137 occurrences in vadose zone core samples	4-58
4-35.	Positive detections of cesium-137 in shallow lysimeters	4-59
4-36.	Positive detections of cesium-137 in aquifer well samples collected between the years 1996 and 2001	4-61
4-37.	Positive detections of cesium-137 in aquifer well samples collected by the <b>U.S.</b> Geological Survey between 1972 and 2000	4-63
4-38.	Detection rates of cesium-137 in the sampled media	4-65
<b>4-</b> 39.	Detection rates of tritium in the sampled media	4-70
4-40.	Comparison concentrations for iodine-129 in groundwater and soils	4-70

4-41.	Waste streams containing iodine-129	4-71
4-42.	Distribution of vadose zone core samples for iodine-129 analyses	4-71
4-43.	Detected concentrations of iodine-129 in the shallow vadose zone lysimeters	4-71
4-44.	Positive detections of iodine-129 in aquifer	4-73
4-45.	Detection rates of iodine-129 in the sampled media	4-74
4-46.	Comparison concentrations for niobium-94 in groundwater and soils	4-76
4-47.	Waste streams containing niobium-94	4-76
4-48.	Comparison concentrations for neptunium-237	4-77
4-49.	Waste streams containing neptunium.237	4-78
4-50.	Detection rate for neptunium-237 in various media	4-79
4-51.	Waste streams containing protactinium-231	4-80
4-52.	Waste streams containing lead-210	4-81
4-53.	Comparison concentrations for plutonium in groundwater and soils	4-82
4-54.	Waste streams containing plutonium-238	4-82
4-55.	Waste streams containing plutonium-239	4-83
4-56.	Waste streams containing plutonium-240	4-83
4-57.	Positive detections of plutonium-238 in vadose zone core samples	4-85
4-58.	Summary of plutonium-238 occurrences in the vadose zone core samples	4-85
4-59.	Positive detections of plutonium-239/240 in vadose zone core samples	4-86
<b>4-6</b> 0.	Summary of plutonium-239/240 occurrences in vadose zone core samples	4-87
4-61.	Detections of plutonium.238, plutonium-239/240, and plutonium-238:plutonium-239/240 activity ratios for vadose zone core samples	4-87
4-62.	Detected concentrations of plutonium-238 in shallow lysimeters	4-89
4-63.	Detections of plutonium and plutonium-238:plutonium-239/240 activity ratios associated with positive detections from the same shallow lysimeter samples	4-92
4-64.	Positive detections of plutonium-238 in the vadose zone samples from 35 to 140-ft depth interval	4-93

4-65.	Plutonium-239/240 detections in lysimeters from the 35 to 140-ft depth interval of the vadose zone	4-94
4-66	Detections of plutonium-238 and plutonium-239/240, and the plutonium-238: 239/240 activity ratios for intermediate-depth lysimeter samples	4-95
4-67.	Positive detections of plutonium-238 from lysimeters and perched water wells	4-96
4-68.	Positive detections of plutonium-239/240 from lysimeters and perched water wells	4-97
<b>4-</b> 69.	Detections of Pu-238, Pu-239/240, and the Pu-238:Pu-239/240 activity ratios for deep lysimeter or perched water well samples	4-98
<b>4-7</b> 0.	Detected concentrations of Pu-238 from aquifer monitoring around the Radioactive Waste Management Complex	4-99
4-71	Plutonium-238 detections in cosampled Wells M 1S and M3S during September and October 2000	4-101
4-72.	Plutonium-238 detections from U.S. Geological Survey aquifer monitoring around the Radioactive Waste Management Complex	4-101
4-73.	Plutonium-239/240 detections in wells monitored by the Idaho National Engineering and Environmental Laboratory	4-104
4-74.	Plutonium-239/240 detections in U.S. Geological Survey monitoring wells	4-106
4-75.	Plutonium detections and Pu-238:Pu-239/240 activity ratios for aquifer samples	4-108
4-76.	Detection rates for Pu-238 in the sampled media	4-111
4-77.	Detection rates for Pu-239/240 in the sampled media	4-112
4-78.	Comparison concentrations for radium-226	4-115
<b>4-7</b> 9.	Waste streams containing radium-226	4-115
4-80.	Positive detections of radium-226 greater than the surface soil background concentration in vadose zone core samples	4-117
4-81.	Radium-226 detections in excess of background concentrations in vadose zone cores by depth interval	4-117
4-82.	Positive detections of radium-226 in shallow lysimeters	4-118
4-83.	Positive detections of radium-226 in aquifer wells	4-120
4-84.	Detection rates for radium-226 in all media	4-121
4-85.	Comparison concentrations for strontium-90	4-123

4-86.	Waste streams containing strontium-90	4-123
4-87.	Positive detections of strontium-90 from vadose zone core samples	4-124
4-88.	Summary of strontium-90 occurrences in vadose zone core samples	. 4-125
4-89.	Detections of strontium-90 in shallow lysimeter samples	4-125
4-90.	Positive detections of strontium-90 from lysimeter wells and perched water wells	4-127
4-91.	Aquifer samples with detecconcentrations of strontium-90	4-127
4-92.	Detecconcentrations of strontium-90 in U.S. Geological Survey aquifer wells	4-130
4-93.	Strontium-90 detection rates in sampled media	4-131
4-94.	Comparison concentrations for technetium-99	4-133
4-95.	Waste streams containing technetium-99	4-133
4-96.	Positive detections of technetium-99 from vadose zone core samples	4-134
4-97.	Summary of technetium-99 occurrences in the vadose zone core samples	4-134
4-98.	Detected concentrations of technetium-99 in shallow lysimeters	. 4-135
<b>4-</b> 99.	Detected concentrations of technetium-99 in the 35 to 140-ft interval of the vadose zone	4-137
4-100.	Positive detections of technetium-99 from lysimeters and perched water wells	4-137
4-101.	Detected concentrations of technetium-99 in aquifer samples around the Radioactive Waste Management Complex	4-138
4-102.	Technetium-99 detection rates in all sampled media	4-140
4-103.	Properties of the natural uranium isotopes	4-141
4-104.	Typical isotopic composition of anthropic uranium (% by weight)	4-143
4-105.	Uranium ratio guideline for estimating potential uranium sources	4-143
4-106.	Comparison concentrations for uranium	4-144
4-107.	Waste streams containing U-233	4-145
4-108.	Waste streams containing uranium-234	4-146
4-109.	Waste streams containing uranium-235	4-147
4-110.	Waste streams containing uranium-236	4-148

4-111.	Waste streams containing uranium-238	4-148
4-112.	Detection rates for uranium-235 and uranium-238 from the gamma logging tool	.4-149
4-113.	Summary of uranium-233/234 occurrences greater than background in the vadose zone core samples	4-149
4-114.	Summary of U-235/236 detections above background concentrations in vadose zone core samples	4-150
4-115.	Uranium-238 concentrations above background from vadose zone core samples	.4-151
<b>4-</b> 116.	Summary of U-238 occurrences greater than background in the vadose zone core samples	.4-151
4-117.	Positive detections of uranium-233/234 from perched water wells greater than 140 ft deep	.4-164
4-118.	Positive detections of uranium-238 from perched water Wells USGS-92 and USGS-8802D	.4-164
4-119.	Detection rates and 1E-05 risk-based concentration exceedance rates for uranium isotopes in all media	4-173
4-120.	Waste streams containing nitrates	4-174
4-121.	Detections of nitrates in Radioactive Waste Management Complex core samples	.4-175
4-122.	Detections of nitrates and nitrites from shallow lysimeters at depths of 0 to 35 ft	.4-176
4-123.	Detected nitrates in lysimeter samples at depths of 35 to 140 ft	4-177
4-124.	Detections of nitrates in the vadose zone soil moisture at depths greater than 140 ft	.4-178
4-125.	Waste streams containing carbon tetrachloride	4-180
4-126.	Post-retrieval distribution of 743-series waste drums	4-180
4-127.	Unvalidated carbon tetrachloride vapor concentrations from Type B vapor probes	.4-182
4-128.	Summary of carbon tetrachloride data collected from 1992 and 1993 surface flux chamber measurements	4-183
4-129.	Summary of carbon tetrachloride vapor concentration results from August 1992 TEM-series well samples	4-186
4-130.	Carbon tetrachloride data for perched water samples in Wells USGS.92, 8802D, and D10 at the Subsurface Disposal Area	4-197
4-131.	Maximum carbon tetrachloride concentrations for the 11 lysimeters with carbon tetrachloride detections	4-198

4-132.	Summary of carbon tetrachloride data from aquifer monitoring wells in the vicinity of the Subsurface Disposal Area	4-201
4-133.	Waste streams containing tetrachloroethylene	4-202
4-134.	Tetrachloroethylenedata for perched water samples at the Subsurface Disposal Area	.4-203
4-135.	Waste streams containing methylene chloride	4-204
4-136.	Summary of positive detections of methylene chloride in soil gas samples collected near the Subsurface Disposal Area	4-205
4-137.	Summary of positive detections for methylene chloride in aquifer samples	4-205
4-138.	Cross-references to nature and extent sections for radionuclide ecological contaminants of potential concern	4-207
4-139.	Summary of radionuclide data collected in and around the Subsurface Disposal Area by the Radiological and Environmental Sciences Laboratory	4-207
4-140.	Inorganics of ecological concern and soil sample analyses	4-208
4-141.	Summary of organics of ecological concern and Waste Area Group 7 soil sample analyses	.4-209
4-142.	Detection rates for all contaminants of potential concern (except carbon tetrachloride) in the vadose zone within specified regions of the Subsurface Disposal Area	4-211
4-143.	Relative detection rate ranking for selected contaminants detected in the vadose zone	.4-211
4-144.	Summary of each contamination area at the Subsurface Disposal Area	4-223
4-145.	Summary associated with each contaminant	4-224
5-1	Contaminants evaluated in the Ancillary Basis for Risk Analysis and the computer models used to assess them	5-2
5-2	Factors used to convert disposal quantity to amount of contaminant in the total waste stream to nitrate as total nitrogen	
5-3	Waste streams for Waste Area Group 7 contaminants of potential concern and long-lived decay chain members	5-6
5-4	Summary of release types and release rate coefficients applied in the source release modeling	5-18
5-5	Waste stream release mechanisms for actinides. activation products. and fission products	5-18
5-6	Contaminant grouping for simulations implemented for the Pre-Draft Remedial Investigation/Baseline Risk Assessment	5_19

5-7	Source areas in the Subsurface Disposal Area implemented in the source release model	5-20
5-8	Mass (in grams) disposed of in the 13 simulated source areas by simulation groups for the Subsurface Disposal Area modeling	5-23
5-9	Lithologic data used for FY 2001 vadose zone model for the Subsurface Disposal Area baseline risk assessment	5-37
5-10	Variogram parameters used in universal kriging of elevations and interbed soil thickness	5-46
5-11	Parameterization of hydrologic properties and source of parameters for surficial sediments. A-B interbed. and fractured basalt	5-49
5-12	Historical flooding volumes and application rates at the Subsurface Disposal Area	5-53
5-13	Best-estimate site-specific $K_{\mbox{\scriptsize d}}s$ used in the baseline risk assessment model	5-70
5-14	Aqueous-phase tortuosities for the baseline risk assessment model	5-74
5-15	Water fluxes (m/day) applied in spreading area simulations	5-81
5-16	Measured and simulated rises in water level for wells in the vicinity of the Radioactive Waste Management Complex during 1982 to 1985 spreading area diversions	5-82
5-17	Comparison of model concentrations and observed concentrations with no adjustments for background concentrations	5 _110
5-18	Maximum 12-m(39-ft) depth simulated Pu-238 and Pu-239 aquifer concentrations (pCi/L) through calendar year 2001 for the base simulation and plutonium $K_{\rm d}$ sensitivity simulations	5_114
5-19	Simulated maximum Pu-238 and Pu-239 B-C interbed soil concentrations (Ci/g) through calendar year 2001 for the base simulation and plutonium $K_{\rm d}$ sensitivity simulations	.5-116
5-20	Maximum 12-m(39-ft) depth simulated Pu-238 and Pu-239 aquifer concentrations (pCi/L) through calendar year 2001 for the base simulation and the plutonium mobile fraction sensitivity simulations	5_116
5-21	Simulated maximum Pu-238 and Pu-239 B-C interbed soil concentrations (Ci/g) through calendar year 2001 for the base simulation and the plutonium mobile fraction sensitivity simulations	5 _117
5-22	Run-naming nomenclature	5-120
5-23	Simulation group names and descriptions	5-121
5-24	Maximum predicted soil and groundwater concentrations for volatile organic contaminants of potential concern quantitatively evaluated in the Interim Risk Assessment	5-123

5-25	Summary of volatile organic compound contaminant of potential concern inventories	.5-124
5-26	Estimated peak groundwater concentrations for revised inventories of volatile organic compound contaminants of potential concern	5-128
5-27	Fractional root distribution for individual plant species for the current scenario	5_134
5-28	Fractional root distribution for individual plant species for the 100+-year scenario	.5-134
5-29	Estimated parameters for the uptake of plant species for the Subsurface Disposal Area for current and 100- to 200+-year scenarios	5-136
5-30	Small-animal density and burrowing parameters for the current scenario	5-139
5-31	Burrow volume and fraction of volume excavated at depth by small animals for the current scenario.	5 _139
5-32	Small-animal density and burrowing parameters for the Subsurface Disposal Area 100+-year scenario	5-140
5-33	Burrow volume and fraction of volume excavated at depth by small animals for the 100 -year scenario in undisturbed soil	5-141
5-34	Summary of improvements in the remedial investigation deasibility study models compared to the Interim Risk Assessment models	5-143
6-1	Maximum soil and groundwater concentrations for each quantitatively evaluated contaminant of potential concern and associated decay chain members	. 6-8
6-2	Toxicity values for quantitatively evaluated noncarcinogens	6-14
6-3	Toxicity values for quantitatively evaluated chemical carcinogens	6-15
6-4	Slope factors and other data used to estimate carcinogenic risks for radionuclide contaminants of potential concern and associated decay chain members	6-19
6-5	Summary of estimated risks and hazard indexes for current and hture occupational exposure scenarios	6-25
6-6	Maximum simulated risks and hazard indexes for the 1.000-year simulation period for a hypothetical hture residential exposure scenario	6-26
6-7	Predicted maximum groundwater concentrations and maximum contaminant levels during 1.000-year and 10.000-year simulation periods	6-44
6-8	Human health uncertainty factors	6-78
6-9	Sensitivity cases addressed	6-81

6-10	Species observed in habitats in and around the Waste Area Group 7 assessment area	6-92
6-11	Threatened or endangered species. sensitive species. and species of concern that may be found at the Idaho National Engineering and Environmental Laboratory	6-94
6-12	Habitat rating conventions for sites of concern to be evaluated in the Operable Unit 7-13/14 ecological risk assessment	6-98
6-13	Summary of the biological field survey for Waste Area Group 7	6-99
6-14	Waste Area Group 7 ecological contaminants of potential concern	6-100
6-15	Comparison of estimated surface and subsurface soil concentrations for radionuclide ecological contaminants of potential concern to ecologically based screening levels	.6-104
6-16	Comparison of estimated surface and subsurface soil concentrations for nonradionuclide ecological contaminants of potential concern to ecologically based screening levels	.6-105
6-17	Summary of the simulated soil concentrations for Waste Area Group 7 ecological contaminants of potential concern	6-106
6-18	Receptors selected for analysis in the Waste Area Group 7 ecological risk assessment	.6-109
6-19	Summary of Waste Area Group 7 exposure routes and ecological receptors modeled for the subsurface soil pathway	6-110
6-20	Species exposure model parameters	6-111
6-21	Hazard quotients for ecological internal and external exposure from subsurface soil for the current scenario	6-113
6-22	Hazard quotients for selected nonradionuclide ecological contaminants of potential concern for the current scenario	6-114
6-23	Hazard quotients for ecological internal and external exposure from subsurface soil for the 100-year scenario	6-114
6-24	Hazard quotients for selected nonradionuclide ecological contaminants of potential concern for the 100-year scenario	6-115
6-25	Contaminants that were not specifically evaluated as part of the Waste Area Group 7 ecological risk assessment	6-116
7-1	Identification of contaminants of concern and 1.000-year peak risk estimates for a hypothetical hture residential exposure scenario	. 7-6
7-2	Ecological contaminants of concern and risk summary for subsurface soil contamination	7-7
7-3	Subsurface Disposal Area contaminants of concern for the groundwater ingestion pathway.	7-13

#### **ACRONYMS**

ABRA Ancillary Basis for Risk Analysis AEC U.S. Atomic Energy Commission

AMWTF Advanced Mixed Waste Treatment Facility

ANL-W Argonne National Laboratory-West

ARA Advanced Reactor Area
ASWS air support weather shield
BBWI Bechtel BWXT Idaho, LLC

BLM U.S. Bureau of Land Management

BNFL British Nuclear Fuels
BRA baseline risk assessment

CERCLA Comprehensive Environmental Response, Compensation, and Liability Act

CFA Central Facilities Area
CFR Code of Federal Regulations

CIDRA Contaminant Inventory Database for fisk Assessment

COC contaminant of concern

COPC contaminant of potential concern

DOE U.S. Department of Energy

DOE-ID U.S. Department of Energy Idaho Operations Office

EBR-1 Experimental Breeder Reactor I
EBSL ecologically based screening level
EDTA ethylenediaminetetraacetic acid

EPA U.S. Environmental Protection Agency

ERIS Environmental Restoration Information System
ESRF Environmental Science and Research Foundation

ESRP Eastern Snake fiver Plain

FFA/CO Federal Facility Agreement and Consent Order

FSP field sampling plan
HDT Historical Data Task

HEAST Health Effects Assessment Summary Tables

HEPA high efficiency particulate air (filter)

HI hazard index HQ hazard quotient HTO tritiated water vapor

IDEQ Idaho Department of Environmental Quality

IDFG Idaho Department of Fish and Game

INEEL Idaho National Engineering and Environmental Laboratory

INPS Idaho Native Plant Society

INTEC Idaho Nuclear Technology and Engineering Center

IRA Interim Risk Assessment

IRIS Integrated fisk Information System

LLW low-level waste

MCL maximum contaminant level NAT neutron-probe access tube

ND nondetection

NPL National Priorities List NRF Naval Reactors Facility

NRTS National Reactor Testing Station

OCVZ organic contamination in the vadose zone

OU operable unit

PCE tetrachloroethylene

PERA Preliminary Evaluation of Remedial Alternatives

PSRA Preliminary Scoping fisk Assessment

PRG preliminary remediation goal

RAGS fisk Assessment Guidance for Superfund

RAO remedial action objective RBC risk-based concentration

RCRA Resource Conservation and Recovery Act

RfC reference concentration

RfD reference dose RFP Rocky Flats Plant

RI/BRA remedial investigation/baseline risk assessment

RI/FS remedial investigation/feasibility study

ROD record of decision

RPDT Recent and Projected Data Task

RWMC Radioactive Waste Management Complex

RWMIS Radioactive Waste Management Information System

SDA Subsurface Disposal Area

SF slope factor SOW scope of work

SRPA Snake fiver Plain Aquifer

SVR soil vault row

SWEPP Stored Waste Examination Pilot Plant

TAN Test Area North
TCA 1,1,1 trichloroethane
TCE trichloroethylene

T/E threatened or endangered

TIMS thermal ionization mass spectrometry

TPR technical procedure
TRA Test Reactor Area

TRU transuranic

TRV toxicity reference value TSA Transuranic Storage Area

USFWS U.S. Fish and Wildlife Service

USFS U.S. Forest Service
USGS U.S. Geological Survey

VOC volatile organic compound VVE vapor vacuum extraction

WAG waste area group

WIPP Waste Isolation Pilot Plant WMF Waste Management Facility



#### 1 INTRODUCTION

Estimated cumulative human health and ecological risks associated with the Subsurface Disposal Area (SDA) are presented in this Ancillary Basis for Risk Analysis(ABRA) report. The ABRA assesses potential risk associated with Waste Area Group (WAG) 7 Operable Unit (OU) 7-13/14, which is the comprehensive remedial investigation/feasibility study (RI/FS) for the Radioactive Waste Management Complex (RWMC) at the Idaho National Engineering and Environmental Laboratory (INEEL). The ABRA is focused exclusively on the SDA, which is the radioactive waste landfill in the RWMC. Though the ABRA has no formal standing under the Federal Facility Agreement and Consent Order (FFA/CO) (DOE-ID 1991), it was prepared in accordance with U.S. Environmental Protection Agency (EPA) RI/FS guidance (EPA 1988). Much of the future RI/FS, including identification of contaminants of concern (COCs), will be taken directly from this ABRA report.<sup>a</sup>

Risk analysis identified 12 radionuclides and four chemical human health contaminants of concern (COCs): Am-241, C-14, I-129, Nb-94, Np-237, Sr-90, Tc-99, U-233, U-234, U-235, U-236, U-238, carbon tetrachloride (CCl<sub>4</sub>), methylene chloride, nitrates, and tetrachloroethylene (PCE). In addition, Pu-238, Pu-239, and Pu-240 were classified as special case groundwater COCs to acknowledge uncertainties about plutonium mobility in the environment and to reassure stakeholders that risk management decisions for the SDA will be fully protective. Ecological risk assessment identified four radionuclides and three chemical ecological COCs: Am-241, Pu-239, Pu-240, Sr-90, cadmium, lead, and nitrates. Details that underlie identification of COCs are presented in the body of this report.

#### 1.1 Purpose

The purpose of the ABRA is to provide the U.S. Department of Energy (DOE), the Idaho Department of Environmental Quality (IDEQ), and the U.S. Environmental Protection Agency (EPA) with a basis for defining scope to complete the OU 7-13/14 comprehensive RI/FS. Information in the RI/FS will support future risk management decisions for WAG 7 under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) (42 USC § 9601 et seq.) and the 1991 Federal Facility Agreement and Consent Order (FFA/CO) (DOE-ID 1991).

#### 1.2 Schedule and Scope

In the decade since the FFA/CO was finalized, the signing agencies, DOE, IDEQ, and EPA, have modified the scope and schedule for OU 7-13/14 because of the magnitude and duration of the project and to accommodate the modified scope and schedule for the OU 7-10 Interim Action for Pit 9 (DOE-ID 1998a, 1993, 1991; DOE 2002). Scope and schedule for OU 7-13/14 were outlined in the original Scope of Work (SOW) (Huntley and Burns 1995), and details were developed in the original OU 7-13/14 RI/FS Work Plan (Becker et al. 1996). In 1997, DOE, IDEQ, and EPA collaborated to revise

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a. During a meeting on July 18, 2002, personnel from DOE-ID, IDEQ, and EPA determined that additional modeling to refine risk estimates for dissolved-phase radioisotopes is not warranted. All three agencies are participating in developing a second revision to the OU 7-13/14 Scope of Work and a second addendum to the Work Plan to formalize this determination and to define scope for completing the OU 7-13/14 comprehensive RI/FS. Because risk estimates developed in this ABRA will be repeated in the future RI/BRA, identifying COCs in this ABRA is appropriate.

the SOW (LMITCO 1997) and to develop an Addendum to the Work Plan (DOE-ID 1998b). According to the revised SOW, the schedule for delivering the draft RI/FS for IDEQ and EPA review under the FFNCO was modified from September 1997 to March 2002.

The schedule was extended again to accommodate additional changes related to the Pit 9 Interim Action in accordance with the April 16,2002, Agreement to Resolve Disputes (DOE 2002). As a result of the agreement, the draft RI/BRA for OU 7-13/14 is scheduled for submittal to IDEQ and EPA under the FFNCO by August 2005, and the associated draft feasibility study is scheduled for submittal by December 2005.

Originally developed in preparation for the submittal of the draft RI/FS in March 2002, the ABRA incorporates relevant information from previous investigations and studies conducted for WAG 7. The evaluation is cumulative and comprehensive, meaning that additive risks for all contaminants and exposure pathways were considered, and that all sources of risk at the SDA were analyzed to evaluate the overall risk potential. The primary elements of the scope of the ABRA are listed below.

- Describe nature and extent of contamination associated with WAG 7.
- Evaluate current and future cumulative and comprehensive risks to human health posed by waste buried in the SDA.
- Perform a limited, screening-level ecological risk assessment to validate the assumption that the SDA poses unacceptable risk to ecological receptors (DOE-ID 1998b).
- Identify contaminants of concern (COCs) within WAG 7. Contaminants of concern are defined as those contaminants likely to require a risk management decision to address potential threats to human health and the environment.

The RWMC comprises the SDA, which contains buried waste; the Transuranic Storage Area (TSA), which contains aboveground waste; and an administration and operations area with various support facilities. Analysis in the ABRA is limited to the buried waste in the SDA.

#### 1.3 Regulatory Background

In January 1986, hazardous waste disposal sites at the INEEL that could pose an unacceptable risk to health, safety, or the environment were identified in an INEEL installation assessment (EG&G 1986). Sites were ranked using either the EPA hazard ranking system for sites with chemical contamination or the DOE-modified hazard ranking system for radioactive-contaminated sites. A score of 28.5 or higher in either category qualified a site for inclusion on the National Priorities List (NPL) (54 FR 48184). Because several sites within the INEEL received scores in excess of 28.5, the entire reservation became a candidate for the NPL. The RWMC received a modified hazard ranking system score of 9.0 and a hazard ranking score of 9.0 based on the large quantities of waste and their radiological, chemical, and physical characteristics.

On July 10, 1987, the U.S. Department of Energy Idaho Operations Office (DOE-ID) entered into a Consent Order and Compliance Agreement with Region 10 of the EPA and the U.S. Geological Survey (USGS) (DOE-ID 1987). The agreement called for implementing an action plan to remediate active and inactive waste disposal sites at the INEEL under authority of the Resource Conservation and Recovery Act (RCRA) (42 USC § 6901 et seq.). Generation, transportation, treatment, storage, and disposal of hazardous waste are regulated by RCRA. Sites identified for further evaluation during the INEEL installation assessment, including those located within the RWMC, were covered by the 1987 agreement.

On November 15, 1989, the EPA added the INEEL to the NPL under CERCLA, also known as the "Superhnd." High-priority sites for investigation and remediation of hazardous materials are identified in the NPL. The decision to add the INEEL to the NPL was based on detection of contaminants in the environment at INEEL sites. A requirement of CERCLA is providing members of the public with opportunities to participate in the decision-making process.

The FFA/CO and its associated Action Plan (DOE-ID 1991) were negotiated and signed by DOE-ID, EPA, and the State of Idaho to implement remediation of the INEEL under CERCLA. Effective December 4, 1991, the FFA/CO superseded the Consent Order and Compliance Agreement. The goals of the FFA/CO are to ensure that (a) potential or actual INEEL releases of hazardous substances to the environment are thoroughly investigated in accordance with the National Contingency Plan (40 CFR 300) and (b) appropriate response actions are taken to protect human health and the environment. The FFA/CO established the procedural framework and schedule for developing, prioritizing, implementing, and monitoring response actions at the INEEL in accordance with CERCLA and RCRA legislation and the Idaho Hazardous Waste Management Act (IDAPA 58.01.05). The FFA/CO is consistent with a general approach approved by EPA and DOE in which agreements with states as full partners would allow site investigation and cleanup to proceed using a single "road map" to minimize conflicting requirements and maximize limited remediation resources. For management purposes, the FFA/CO divided the INEEL into 10 WAGs. Waste Area Group 7, comprising the RWMC, is located in the southwest quadrant of the INEEL. The INEEL, the RWMC, and the other facilities and their corresponding WAGs are represented on the relief map in Figure 1-1. A map of the RWMC showing the SDA, the TSA and administration and operations area is provided in Figure 1-2.

The FFA/CO Action Plan further divided the environmental site investigation at WAG 7 into numerous OUs. In the standard FFA/CO RI/FS process, potential source areas (sites) within each WAG were assigned to an OU for investigation or remedial activities. This process was designed to match the rigor of the assessment process with the complexity of each individual site and to allow for flexibility in determining appropriate further action as an assessment or action is completed. However, in addition to OUs defined as specific release sites, several OUs within WAG 7 were defined as contaminant exposure pathways (e.g., the air pathway and the vadose zone pathway).

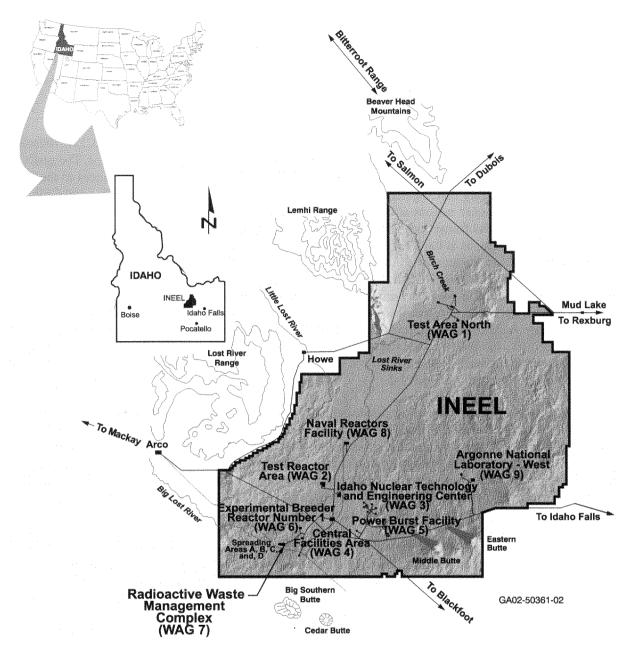
The RI/FS for OU 7-13 transuranic (TRU) pits and trenches was established to investigate only those portions of the SDA containing buried TRU radionuclides. The OU 7-14 comprehensive RI/FS was designated as the final, cumulative investigation of WAG 7. Subsequently, however, OU 7-13 and OU 7-14 were combined into a single OU 7-13/14, and now the comprehensive RI/FS for WAG 7 includes the TRU pits and trenches (Huntley and Burns 1995).

#### 1.4 Report Organization

The ABRA contains eight sections. Individual sections conclude with references cited in that section, and a master reference list comprises the last section in the report. In addition, numerous supporting documents are available in the Administrative Record. The report format is adapted from the outline suggested by the EPA (1988) for remedial investigations. A summary of each section follows:

1-3

b. The Administrative Record is a collection of project documents and is maintained in accordance with the Comprehensive Environmental Response, Compensation, and Liability Act. The official Administrative Record is located at the Idaho National Engineering and Environmental Laboratory (INEEL) Technical Library in Idaho Falls, Idaho. Copies of documents in the Administrative Record are located in Idaho information repositories in the Boise INEEL Office, the Marshall Public Library in Pocatello, the Shoshone-Bannock Library in Fort Hall, and online at http://ar.inel.pov.



WAG 10 includes all sites, disposal areas, and portions of the Snake River Plain Aquifer that either are outside the boundaries of WAGs 1 through 9 or are not included within the other WAGs.

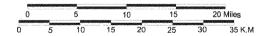


Figure 1-1. Relief map of the Idaho National Engineering and Environmental Laboratory showing locations of the Radioactive Waste Management Complex, other facilities, and corresponding waste area groups.

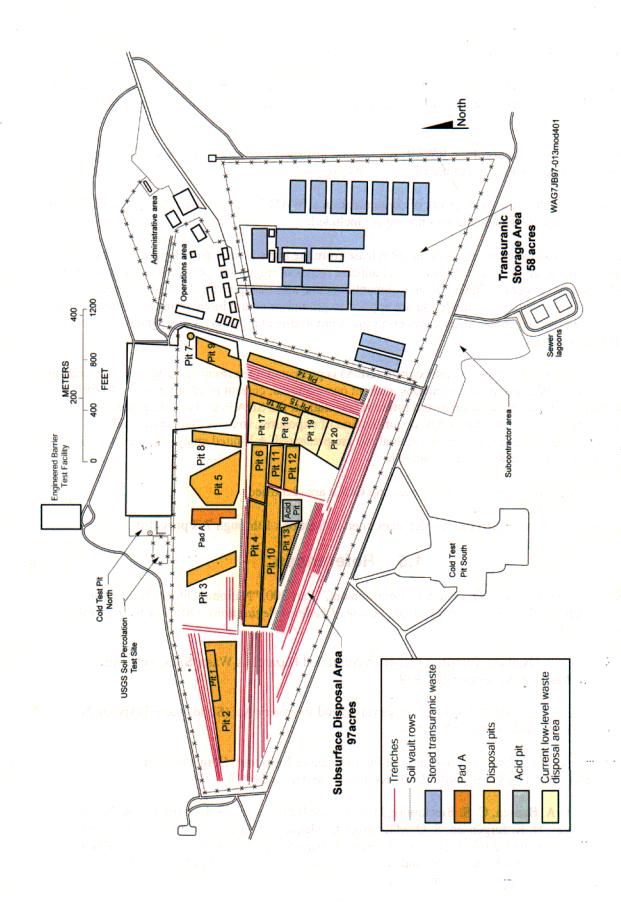


Figure 1.2. Map of the Radi Waste Management Complex.

- Section 1—Introductory information for the ABRA is presented.
- Section 2—The INEEL and the RWMC are described, including general historical background and physical characteristics such as topography, meteorology, geology, hydrology, demography, and ecology.
- Section 3—A synopsis of the RWMC operational history is provided. Studies used to assess
   WAG 7 under CERCLA and the FFA/CO are described.
- Section 4—The nature and extent of contamination at WAG 7 are addressed. Descriptions of waste and results of environmental monitoring are included.
- Section 5—Simulations of contaminant release from the buried waste and migration in the
  environment are presented. Release mechanisms, routes of migration, persistence of contaminants
  of potential concern (COPCs) in environmental media, and transport mechanisms are discussed.
  Results from source term modeling are applied to groundwater and biotic transport simulations to
  estimate potential contaminant concentrations in environmental media. A conceptual site model
  also is presented.
- Section 6—The baseline risk assessment (BRA) is presented. Deterministic risks are estimated for
  four human health exposure scenarios: current occupational, current residential (at the INEEL
  boundary), hture occupational, and hture residential (at the SDA boundary). Exposure
  assessment, media concentrations, quantification of exposures, toxicity assessment and risk
  characterization, and uncertainties in analysis are presented. A limited analysis of current and
  hture ecological risks also is presented.
- Section 7—The ABRA is summarized, and COCs are identified.
- Section 8—A master list of the references cited in Sections 1 through 7 is provided.

#### 1.5 References

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